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Final Regulation Agency Background Document

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| Agency name | Virginia Department of Education |
| Virginia Administrative Code (VAC) citation | 8 VAC 20 -542-10 |
| Regulation title | Regulations Governing the Review and Approval of Education Programs in Virginia |
| Action title | Regulations Governing the Review and Approval of Education Programs in Virginia |
| Date this document prepared | April 13, 2007 |

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Orders 21 (2002) and 58 (1999), and the *Virginia Register Form, Style, and Procedure Manual*.

Brief summary

Please provide a brief summary (no more than 2 short paragraphs) of the proposed new regulation, proposed amendments to the existing regulation, or the regulation proposed to be repealed. Alert the reader to all substantive matters or changes. If applicable, generally describe the existing regulation. Also, please include a brief description of changes to the regulation from publication of the proposed regulation to the final regulation.

The program approval process in Virginia is designed to ensure an alignment between approved education programs and the needs of prek-12 schools. Due to significant proposed revisions to the *Regulations Governing Approved Programs for Virginia Institutions of Higher Education*, (8 VAC 20-541-10 et. seq.), Effective July 1, 2001, the Board of Education proposes to promulgate new *Regulations Governing the Review and Approval of Education Programs in Virginia* (8 VAC 20-542-10 et. seq.).

Substantive elements of the proposed new regulations focus on revision of selected definitions to conform with changes in the proposed new regulations; modifications in administration of the proposed new regulations, including separation of the accreditation process from the program approval process; the development of regulations focused on biennial measures of accountability;

and inclusion and modification of competencies contained in the 1998 Regulations Governing the Licensure of School Personnel.

Statement of final agency action

Please provide a statement of the final action taken by the agency including (1) the date the action was taken, (2) the name of the agency taking the action, and (3) the title of the regulation.

At its March 29, 2007, meeting, the Board of Education adopted the *Regulations Governing the Review and Approval of Education Programs in Virginia* (8 VAC 20-542-10 et seq.) and authorized personnel in the Department of Education to continue the Administrative Process Act.

Legal basis

Please identify the state and/or federal legal authority to promulgate this proposed regulation, including (1) the most relevant law and/or regulation, including Code of Virginia citation and General Assembly chapter numbers, if applicable, and (2) promulgating entity, i.e., agency, board, or person. Describe the legal authority and the extent to which the authority is mandatory or discretionary.

- **Code of Virginia, Section 22.1-16. Bylaws and regulations generally:** The Board of Education may adopt bylaws for its own government and promulgate such regulations as may be necessary to carry out its powers and duties and the provisions of this title.
- **Code of Virginia, Section 22.1-298. Regulations Governing Licensure:** Persons seeking initial licensure who graduate from a Virginia institution of higher education shall, on or after July 1, 2002, only be licensed as instructional personnel by the Board of Education if the endorsement areas offered at such institution have been assessed by a national accrediting agency or by a state approval process, with final accreditation by the Board of Education.
- **Code of Virginia, Section 22.1-305.2 Advisory Board on Teacher Education and Licensure:** The Advisory Board on Teacher Education and Licensure shall advise the Board of Education and submit recommendations on policies applicable to [Teacher Education and Licensure].

Purpose

Please explain the need for the new or amended regulation. Describe the rationale or justification of the proposed regulatory action. Detail the specific reasons it is essential to protect the health, safety or welfare of citizens. Discuss the goals of the proposal and the problems the proposal is intended to solve.

As stipulated in Section 22.1-298 of the *Code of Virginia*, the Board of Education prescribes the requirements for the licensure of teachers and establishes other requirements for teacher preparation. The program approval process in Virginia is designed to ensure an alignment between approved education programs and the needs of pre-k-12 schools.

During recent years, national, state, and local educators as well as members of the general public have placed increased emphasis on the need to ensure in our nation's schools the provision of highly qualified teachers who in turn make a positive impact on pre-k-12 student achievement. Federal legislation such as the *2001 No Child Left Behind Act (NCLB)* and the *1998 Reauthorization of the Title II Higher Education Act (Title II HEA)* clearly express the need for increased accountability from states and institutions of higher education in the preparation, certification, and licensure of teachers and other school personnel.

Substance

Please identify and explain the new substantive provisions, the substantive changes to existing sections, or both where appropriate. A more detailed discussion is required under the "All changes made in this regulatory action" section.

The program approval process in Virginia is designed to ensure an alignment between approved education programs and the needs of pre-k-12 schools. Due to significant proposed revisions to the *Regulations Governing Approved Programs for Virginia Institutions of Higher Education*, (8 VAC 20-541-10 et. seq.), Effective July 1, 2001, the Board of Education promulgated new *Regulations Governing the Review and Approval of Education Programs in Virginia* (8 VAC 20-542-10 et. seq.).

Substantive elements of the proposed new regulations focus on revision of selected definitions to conform with changes in the proposed new regulations; modifications in administration of the proposed new regulations, including separation of the accreditation process from the program approval process; the development of regulations focused on biennial measures of accountability; and inclusion and modification of competencies contained in the 1998 *Regulations Governing the Licensure of School Personnel*. Substantive changes or provisions have been made to the following sections of the proposed regulations: 8 VAC 20-542-10 et seq.

Issues

Please identify the issues associated with the proposed regulatory action, including:

- 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions;
- 2) the primary advantages and disadvantages to the agency or the Commonwealth; and
- 3) other pertinent matters of interest to the regulated community, government officials, and the public. If there are no disadvantages to the public or the Commonwealth, please indicate.

The *Code of Virginia* requires that the Board of Education prescribe the requirements for the licensure of teachers and establishes other requirements for teacher preparation. New regulations are needed to respond to enactments of federal and state laws. The primary advantage is that the proposed new regulations will be aligned with federal and state laws and recommendations to improve the preparation of instructional personnel in Virginia.

Changes made since the proposed stage

Please describe all changes made to the text of the proposed regulation since the publication of the proposed stage. For the Registrar’s office, please put an asterisk next to any substantive changes.

| Section number | Requirement at proposed stage | What has changed | Rationale for change |
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| 8 VAC 20-542-10; 8 VAC 20-542-20; 8 VAC 20-542-30;8 VAC 20-542-50 | The proposed language states: <u>“Field experiences” means program components that are conducted in off-campus settings. They include classroom observations, tutoring, assisting teachers and school administrators, student teaching, and internships.</u> <u>“Professional education program” means the institution, college, school, department, or other administrative body within a Virginia institution of higher education, or another entity for a defined educator preparation program that is primarily responsible for the preparation of teachers and other professional school personnel.</u> | The amended language states: <u>“Field experiences” means program components that are conducted in off-campus settings [or on-campus settings dedicated to the instruction of children who would or could otherwise be served by school divisions in Virginia, or accredited non-public schools, and are accredited for this purpose by external entities such as regional accrediting agencies.] They include classroom observations, tutoring, assisting teachers and school administrators, student teaching, and internships.</u> <u>“Professional education program” means the [Virginia] institution, college, school, department, or other administrative body within a Virginia institution of higher education, or another [Virginia] entity for a defined educator preparation program that is primarily responsible for the preparation of teachers and other professional school personnel.</u> | To expand definitions for these terms and to add language to align with procedures for administration, accreditation, and application of standards for the regulations; to provide reference to education programs in Virginia. |

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| <p>8 VAC 20-542- 40</p> | <p>The proposed language states:</p> <p><u>2. Candidate progress and performance on an assessment of basic skills as prescribed by the Board of Education for individuals seeking entry into an approved education preparation program. Indicators of the achievement of this standard shall include the following:</u></p> <p style="padding-left: 40px;"><u>a. Results on Board of Education prescribed entry-level assessments; and</u></p> <p style="padding-left: 40px;"><u>b. Documentation of tutorial assistance.</u></p> <p><u>4. Evidence of opportunities for candidates to participate in hard-to-staff schools throughout the program experiences. The indicator of the achievement of this standard shall include evidence that the professional education programs provide opportunities for candidates to have program experiences in hard-to-staff schools within each biennial period.</u></p> <p><u>5. Evidence of contributions to preK-12 student achievement by candidates completing and exiting the program.</u></p> <p><u>6. Evidence of employer job satisfaction with candidates completing and exiting the program.</u></p> | <p>The amended language states:</p> <p><u>2. Candidate progress and performance on an assessment of basic skills as prescribed by the Board of Education for individuals seeking entry into an approved education preparation program. Indicators of the achievement of this standard shall include the following:</u></p> <p style="padding-left: 40px;"><u>a. Results on Board of Education prescribed entry-level assessments; and</u></p> <p style="padding-left: 40px;"><u>b. Documentation [of tutorial assistance] [that candidates enrolled in the program who fail to achieve a minimum score established by the Board of Education have the opportunity to address any deficiencies].</u></p> <p><u>4. Evidence of opportunities for candidates to participate in [hard-to-staff schools] [diverse] [urban and rural][school settings that provide] [rich] [experiences with] [diverse] [populations that include racial, economic, linguistic, and ethnic diversity] throughout the program experiences. The indicator of the achievement of this standard shall include evidence that the professional education programs provide opportunities for candidates to have program experiences in [hard-to-staff schools] [diverse][urban and rural][school settings that provide] [rich] [experiences with] [diverse] [populations that include racial, economic, linguistic, and ethnic diversity] within each biennial period.]</u></p> <p><u>5. Evidence of contributions to preK-12 student achievement by candidates completing [and exiting] the program.</u></p> <p><u>6. Evidence of employer job satisfaction with candidates completing [and exiting] the program.</u></p> | <p>To reflect requirements of the <u>Code of Virginia</u>.</p> <p>To permit a broader interpretation and application of the term “hard to staff schools”.</p> <p>To comply with public comment received.</p> <p>To comply with public comment received.</p> |
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| <p>8 VAC 20-542-60</p> | <p>The proposed language states: <u>B. Standard 2: Candidate Performance on Competencies for Endorsement Areas...</u> <u>Indicators of the achievement of this standard shall include the following:</u> <u>f. Candidates pass basic entry-level competency assessments prescribed by the Virginia Board of Education.</u></p> | <p><u>B. Standard 2: Candidate Performance on Competencies for Endorsement Areas...</u> Indicators of the achievement of this standard shall include the following: <u>f. Candidates pass [take] basic entry-level competency assessments prescribed by the Virginia Board of Education.</u></p> | <p>To comply with <u>Code of Virginia</u> requirements.</p> |
| <p>8 VAC 20-542-80;</p> | <p>The proposed language states: 8 VAC 20-542-80. Professional studies requirements for early/primary education, elementary education, and middle education. <u>1. Human growth and development (birth through adolescence): Skills in this area shall contribute to an understanding of the physical, social, emotional, and intellectual development of children and the ability to use this understanding in guiding learning experiences.</u> <u>2. Curriculum and instructional procedures: a. Early/primary education preK-3 or elementary education preK-6 curriculum and instructional procedures: Skills in this area shall contribute to an understanding of the principles of learning; the application of skills in discipline-specific methodology; communication processes; selection and use of materials, including media and computers; and evaluation of pupil performance. The teaching methods, including for gifted and talented students and those students with disabling conditions, must be appropriate for the level of endorsement (preK-3 or preK-6) and be tailored to promote student academic progress and effective preparation for the Standards of Learning assessments.</u></p> | <p>The amended language states: 8 VAC 20-542-80. Professional studies requirements for early/primary education, elementary education, and middle education. <u>1. Human growth and development (birth through adolescence): Skills in this area shall contribute to an understanding of the physical, social, emotional, [speech and language,] and intellectual development of children and the ability to use this understanding in guiding learning experiences [and relating meaningfully to students].</u> <u>2. Curriculum and instructional procedures: a. Early/primary education preK-3 or elementary education preK-6 curriculum and instructional procedures: Skills in this area shall contribute to an understanding of the principles of learning; the application of skills in discipline-specific methodology; communication processes; selection and use of materials, including media and computers; [selection, development and use of appropriate curricula, methodologies, and materials that support and enhance student learning and reflect the research on unique, age-appropriate, and culturally relevant curriculum and pedagogy;] [and] evaluation of pupil performance]; and the relationship[s] among assessment, instruction, and monitoring student progress to include student performance measures in grading practices, the ability to construct and interpret valid assessments using a variety of formats in order to</u></p> | <p>To add inclusive language regarding speech and language skill development in all students To add competencies relative to Instructional Design Based on Assessment Data To enhance the competencies for early childhood education.</p> |

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| | <p><u>b. Middle education 6-8 curriculum and instructional procedures: Skills in this area shall contribute to an understanding of the principles of learning;...and evaluation of</u></p> | <p><u>measure student attainment of essential skills in a standards-based environment, and the ability to analyze assessment data to make decisions about how to improve instruction and student performance.] The teaching methods, including for [limited English proficient students,] gifted and talented students and those students with disabling conditions, must be appropriate for the level of endorsement (preK-3 or preK-6) and be tailored to promote student academic progress and effective preparation for the Standards of Learning assessments.</u> <u>The teaching methods, including for [limited English proficient students,] gifted and talented students and those students with disabling conditions, must be appropriate for the level of endorsement (preK-3 or preK-6) and be tailored to promote student academic progress and effective preparation for the Standards of Learning assessments. Study in methods of improving communication between schools and families, ways of increasing family involvement in student learning at home and in school, [and] the Standards of Learning [; and Foundation Blocks for Early Learning] shall be included. [Early childhood educators must understand the role of families in child development and in relation to teaching educational skills. They must demonstrate knowledge and skills in communicating with families regarding the social and instructional needs of children. Early childhood educators must understand the role of the informal and play-mediated settings for promoting students' skills and development and must demonstrate knowledge and skill in interacting in such situations to promote specific learning outcomes as reflected in Virginia's Foundation Blocks for Early Learning.]</u></p> <p><u>b. Middle education 6-8 curriculum and instructional procedures: Skills in this area shall contribute to an understanding of the principles of learning;...and evaluation of pupil performance[; and the relationship[s] among assessment, instruction, and</u></p> | <p>To add competencies relative to Instructional Design Based on Assessment Data</p> |
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| | <p><u>pupil performance. The teaching methods, including for gifted and talented students and students with disabling conditions, must be appropriate for the middle education endorsement ...</u></p> | <p><u>monitoring student progress to include student performance measures in grading practices, the ability to construct and interpret valid assessments using a variety of formats in order to measure student attainment of essential skills in a standards-based environment, and the ability to analyze assessment data to make decisions about how to improve instruction and student performance.]</u> <u>The teaching methods, including for [limited English proficient students,] gifted and talented students and students with disabling conditions, must be appropriate for the middle education endorsement ...</u></p> | |
| <p>Section did not exist in the proposed regulations</p> | | <p>[4][3]. Classroom [and behavior] management: Skills in this area shall contribute to an understanding and application of classroom [and behavior] management techniques, [classroom community building,] and individual interventions, including techniques that promote emotional well-being and teach and maintain behavioral conduct and skills consistent with norms, standards, and rules of the educational environment. This area shall address diverse approaches based upon behavioral, cognitive, affective, social and ecological theory and practice. [Approaches should support professionally appropriate practices that promote positive redirection of behavior, development of social skills, and of self discipline. The link between classroom [and behavior] management and students' ages must be understood and demonstrated in techniques used in the classroom.]</p> | <p>To add competencies relative to Classroom and Behavior Management skills</p> |
| <p>Section did not exist in the proposed regulations</p> | | <p>[5][4]. Foundations of education: Skills in this area shall be designed to develop an understanding of the historical, philosophical, and sociological foundations underlying the role, development and organization of public education in the United States. Attention must be given to the legal status of teachers and students, including federal and state laws and regulations, school as</p> | <p>To add competencies in Foundations of education to professional studies requirements in response to public comment</p> |

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| | <p><u>6. Supervised classroom experience. The student teaching experience should provide for the prospective teacher to be in classrooms full time for a minimum of 500 clock hours (including pre- and post-clinical experiences) with at least 300 clock hours spent supervised in direct teaching activities (providing direct instruction) at the level of endorsement...</u></p> | <p><u>an organization/culture, and contemporary issues in education. The historical, philosophical, and sociological foundations of the instructional design based on assessment data (the relationship[s] among assessment, instruction, and monitoring student progress to include student performance measures in grading practices, the ability to construct and interpret valid assessments using a variety of formats in order to measure student attainment of essential skills in a standards-based environment, and the ability to analyze assessment data to make decisions about how to improve instruction and student performance) must be addressed.]</u></p> | |
| <p>8 VAC 20-542-530</p> | <p><u>8 VAC 20-542-530. Administration and supervision preK-12.</u></p> <p><u>[3-] [2.] Complete 440 clock hours, with a deliberately structured and supervised internship that provides exposure to multiple sites (elementary, middle, high, central office, agency) with diverse student populations.</u></p> | <p><u>8 VAC 20-542-530. Administration and supervision preK-12.</u></p> <p><u>[3-] [2.] Complete [440 clock hours, with] [a minimum of 320 clock hours of] a deliberately structured and supervised internship that provides exposure to multiple sites (elementary, middle, high, central office, agency) with diverse student populations.</u></p> | <p>To align clock hours for supervised classroom experience and administration and supervision field experiences in Professional studies requirements with proposed licensure regulations.</p> <p>To align clock hours for administration and supervision field experiences with proposed licensure regulations and respond to public comment regarding the number or hours proposed.</p> |
| <p>8 VAC 20-542-90</p> | <p>No language existed regarding competencies for the Early Childhood for Three- and Four-Year-Olds (add-on endorsement).</p> | <p>The new language states: <u>[8 VAC 20-542-90. Early Childhood for Three-and Four-Year-Olds (Add-on Endorsement).</u> A. <u>The program in early childhood</u></p> | <p>To establish new competencies for add-on endorsement for Early Childhood for Three-and Four-Year-Olds to comply with proposed licensure</p> |

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| | | <p><u>education for three- and four-year-olds shall ensure that the candidate has demonstrated the following competencies:</u></p> <ol style="list-style-type: none"> 1. <u>Understanding child growth and development, with a specific focus on three- and four-year-olds, including:</u> <ol style="list-style-type: none"> a. <u>Knowledge of characteristics and developmental needs of three- and four-year-olds, including the ability to recognize indicators of atypical development, in the domains of social, emotional, cognitive, physical, and gross and fine motor development;</u> b. <u>Understanding of the multiple interacting influences on child development (biological and environmental), interconnectedness of developmental domains, the wide range of ages at which developmental skills are manifested, and the individual differences in behavioral style and</u> c. <u>Knowledge of child development within the context of family, culture, and society.</u> 2. <u>Understanding principles of developmental practice, with a focus on three- and four-year-olds, including practices that are:</u> <ol style="list-style-type: none"> a. <u>Appropriate to the child's age and stage of development;</u> b. <u>Appropriate for children with a wide range of individual differences in abilities, interests, and behavioral styles; and</u> c. <u>Appropriate for the child's cultural background and experience.</u> 3. <u>Understanding health, safety, and nutritional practices that impact early learning including:</u> <ol style="list-style-type: none"> a. <u>Practices and procedures that support health status</u> | <p>requirements.</p> |
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| | | <p><u>conducive to optimal development (e.g., health assessment, prevention of the spread of communicable disease, oral hygiene, reduction of environmental hazards, injury prevention, emergency preparedness);</u></p> <ul style="list-style-type: none"> b. <u>Indicators of possible child abuse or neglect and the appropriate response if such indicators are observed;</u> c. <u>Nutritional and dietary practices that support healthy growth and development while remaining sensitive to family preferences;</u> d. <u>Skills for communicating with families about health and dietary concerns;</u> e. <u>Community resources that support healthy living; and</u> f. <u>Practices that allow children to become independent and knowledgeable about healthy living;</u> <p>4. <u>Understanding and application of formal and informal assessment procedures for documenting development and knowledge of how to use assessment to plan curriculum, including:</u></p> <ul style="list-style-type: none"> a. <u>Age and stage-appropriate methods for assessing and documenting development;</u> b. <u>Identifying and documenting children’s interests, strengths and challenges; and</u> c. <u>Communicating with families to acquire and to share information relevant to assessment.</u> <p>5. <u>Understanding effective strategies for facilitating positive reciprocal relationships with children for teachers, families and communities, including mutual respect, communication strategies,</u></p> | |
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| | | <p><u>collaborative linkages among families, and community resources, and nurturing the capacity of family members to serve as advocates on behalf of children.</u></p> <p>6. <u>Understanding strategies for planning, implementing, assessing, and modifying physical and psychological aspects of the learning environment to support physical, cognitive, and social, as well as emotional well-being in children with a broad range of developmental levels, special needs, individual interests, and cultural backgrounds, including the ability to:</u></p> <ul style="list-style-type: none"> a. <u>Utilize learning strategies that stimulate curiosity, and encourage participation in exploration and play;</u> b. <u>Provide curriculum experiences that facilitate learning goals in content areas and provide opportunities to acquire concepts and skills that are precursors to academic content taught in elementary school;</u> c. <u>Adapt tasks to the child's zone of proximal development;</u> d. <u>Nurture children's development through experiences, relationships and active engagement in play;</u> e. <u>Select materials/equipment, arrange physical space, and plan schedules/routines to stimulate and facilitate development; and</u> f. <u>Collaborate with families, colleagues, and members of the broader community to construct learning environments that promote a spirit of unity, respect, and service in the interest of the common good.</u> <p>7. <u>Understanding strategies that create positive and nurturing</u></p> | |
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| <p>8 VAC 20-542-100;</p> | <p>The proposed language states: <u>8 VAC 20-542-90. Early/primary education preK-3.</u> <u>The program for early/primary education preK-3 shall ensure that the candidate has demonstrated the following competencies:</u> <u>1. Methods.</u> <u>d. The use of appropriate methods to help learners develop knowledge and basic skills, sustain intellectual curiosity, and problem solve;</u></p> | <p><u>relationships with each child based on respect, trust, calm approaches, respect for diversity and acceptance of individual differences in ability levels, temperament, and other characteristics, including the ability to:</u> a. <u>Emphasize the importance of supportive verbal and nonverbal communication;</u> b. <u>Establish classroom [and behavior] management practices that are respectful, meet children's emotional needs, clearly communicate expectations for appropriate behavior, promote pro-social behaviors, prevent or minimize behavioral problems through careful planning of the learning environment, teach conflict resolution strategies, and mitigate or redirect challenging behaviors; and</u> c. <u>Build positive, collaborative relationships with children's families with regard to behavioral guidance.]</u></p> <p>The amended language states: <u>8 VAC 20-542-[90] [100]. Early/primary education preK-3.</u> <u>The program for early/primary education preK-3 shall ensure that the candidate has demonstrated the following competencies:</u> <u>1. Methods.</u> <u>d. The use of appropriate methods [, including those in visual and performing arts,] to help learners develop knowledge and basic skills, sustain intellectual curiosity, and problem solve;</u></p> | <p>To add language to the competencies to include reference to “visual and performing arts” and to align competencies with proposed licensure requirements.</p> |
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| <p>8 VAC 20-542-110</p> | <p><u>8 VAC 20-542-100. Elementary education preK-6.</u></p> <p><u>The program in elementary education preK-6 may require that the candidate has completed an undergraduate major in interdisciplinary studies (focusing on the areas of English, mathematics, history and social sciences, and science) or in Virginia’s core academic areas of English, mathematics, history and social sciences (i.e., history, government, geography and economics), or science and demonstrated the following competencies:</u></p> <p><u>1. Methods.</u></p> <p><u>d. The use of appropriate methods to help learners develop knowledge and basic skills, sustain intellectual curiosity, and problem solve;</u></p> <p><u>e. The ability to utilize effective classroom management skills through methods that shall build responsibility and self-discipline and maintain a positive learning environment;</u></p> | <p><u>8 VAC 20-542-[100] [110]. Elementary education preK-6.</u></p> <p><u>The program in elementary education preK-6 may require that the candidate has completed an undergraduate major in interdisciplinary studies (focusing on the areas of English, mathematics, history and social sciences, and science) or in Virginia’s core academic areas of English, mathematics, history and social sciences (i.e., history, government, geography and economics), or science and demonstrated the following competencies:</u></p> <p><u>1. Methods.</u></p> <p><u>d. The use of appropriate methods [including those in visual and performing arts,] to help learners develop knowledge and basic skills, sustain intellectual curiosity, and problem solve;</u></p> <p><u>e. The ability to utilize effective classroom [and behavior] management skills through methods that shall build responsibility and self-discipline and maintain a positive learning environment;</u></p> | <p>To add language to the competencies to include reference to “visual and performing arts” and to align competencies with proposed licensure requirements.</p> |
| <p>8 VAC 20-542-260;</p> | <p>The proposed language states:</p> <p><u>8 VAC 20-542-250. Dance arts preK-12.</u></p> <p><u>The program in dance arts shall ensure that the candidate has demonstrated the following competencies:</u></p> <p><u>2. Understanding of the knowledge, skills, and processes for teaching dance arts to meet the developmental levels of students in preK-12, including the following:</u></p> | <p>The amended language states:</p> <p><u>8 VAC 20-542-[250] [260]. Dance arts preK-12.</u></p> <p><u>The program in dance arts shall ensure that the candidate has demonstrated the following competencies:</u></p> <p><u>2. Understanding of the knowledge, skills, and processes for teaching dance arts to meet the developmental levels [and academic needs] of students in preK-12, including the following:</u></p> | <p>To add language to the competencies to include reference to student “academic needs” and to align competencies with proposed licensure requirements.</p> |

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| <p>8 VAC 20-542-390</p> | <p><u>8 VAC 20-542-380. Music education – instrumental preK-12.</u></p> | <p><u>8 VAC 20-542-380 [390]. Music education – instrumental preK-12.</u></p> | <p>To add language to the competencies to include reference to student “academic needs” and to align competencies with proposed licensure requirements.</p> |
| <p>8 VAC20-542-400</p> | <p><u>8 VAC 20-542-390. Music education – vocal/choral preK-12.</u></p> <p>A. The program in music education – vocal/choral preK-12 shall ensure that the candidate has demonstrated the following competencies:</p> <p>2. Understanding of the common elements of music–<u>rhythm, melody, harmony, timbre, texture, dynamics, form–and their relationship with each other and to employ this understanding in the analysis of music.</u></p> | <p><u>8 VAC 20-542-390 [400]. Music education – vocal/choral preK-12.</u></p> <p>A. The program in music education – vocal/choral preK-12 shall ensure that the candidate has demonstrated the following competencies:</p> <p>2. Understanding of the common elements of music–<u>rhythm, melody, harmony, timbre, texture, dynamics, form–and their relationship with each other [and student academic needs] and to employ this understanding in the analysis of music.</u></p> | <p>To add language to the competencies to include reference to student “academic needs” and to align competencies with proposed licensure requirements.</p> |
| <p>8 VAC 20-542-470</p> | <p>The proposed language states:</p> <p><u>8 VAC 20-542-460. Special education adapted curriculum K-12.</u></p> <p>c. <u>An understanding and application of classroom [and behavior] management techniques and individual interventions, including techniques that:</u></p> <p>B. The program in special education adapted curriculum K-12 shall ensure... The candidate shall demonstrate the following competencies to prepare children and youth to acquire the functional, academic, and community</p> | <p>The amended language states:</p> <p><u>8 VAC 20-542-460 [470]. Special education adapted curriculum K-12.</u></p> <p>c. <u>An understanding and application of classroom [and behavior] management techniques and individual interventions, including techniques that:</u></p> <p>B. The program in special education adapted [aligned] curriculum K-12 shall ensure... The candidate shall demonstrate the following competencies to prepare children and youth to acquire the functional, academic, and community living skills necessary to reach an appropriate level of independence and be assessed in</p> | <p>To align competencies for Classroom and Behavior Management with language in proposed licensure regulations.</p> <p>To align language, based on public comment, with language used in special education assessment requirements.</p> |

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| <p>8 VAC 20-542-480</p> | <p><u>living skills necessary to reach an appropriate level of independence and be assessed in progress toward an adapted curriculum while participating in programs with nondisabled peers to the fullest extent possible:</u></p> <p><u>(3) Demonstrate the use of assessment, evaluation, and other information to develop and implement individual educational planning and group instruction with students with disabilities in an [adapted] [aligned] curriculum across the K-12 grade levels, including:</u></p> <p><u>8 VAC 20-542-470. Special education general curriculum K-12.</u></p> <p><u>c. An understanding and application of classroom management techniques and individual interventions, including techniques that:</u></p> <p><u>8 VAC 20-542-480. Special education – speech-language pathology assistants preK-12.</u></p> <p>New endorsement requirements for Speech-language pathology assistants added.</p> | <p><u>progress toward an [adapted] [aligned] curriculum while participating in programs with nondisabled peers to the fullest extent possible:</u></p> <p><u>(3) Demonstrate the use of assessment, evaluation, and other information to develop and implement individual educational planning and group instruction with students with disabilities in an [adapted] [aligned] curriculum across the K-12 grade levels, including:</u></p> <p><u>8 VAC 20-542-[470] [480]. Special education general curriculum K-12.</u></p> <p><u>c. An understanding and application of classroom [and behavior] management techniques and individual interventions, including techniques that:...</u></p> <p><u>8 VAC 20-542-480. Special education – speech-language pathology assistants preK-12.</u></p> <p>Competencies for new endorsement requirements for speech-language pathology assistants removed from proposed regulations.</p> | <p>To align language, based on public comment, with language used in special education assessment requirements.</p> <p>To align competencies for Classroom and Behavior Management with language in proposed licensure regulations.</p> <p>Competencies deleted based on public comment and to align with proposed licensure regulations.</p> |
| <p>8 VAC 20-542-510</p> | <p><u>8 VAC 20-542-510. Theater arts preK-12.</u></p> <p><u>The program in theater arts preK-12 shall ensure that the candidate has demonstrated the following competencies:</u></p> <p><u>2. Understanding of the knowledge, skills and processes for teaching</u></p> | <p><u>8 VAC 20-542-510. Theater arts preK-12.</u></p> <p><u>The program in theater arts preK-12 shall ensure that the candidate has demonstrated the following competencies:</u></p> <p><u>2. Understanding of the knowledge, skills and processes for teaching theater arts to the developmental</u></p> | <p>To add language to the competencies to include reference to “visual and performing arts” and to align competencies with proposed licensure requirements.</p> |

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| | <p><u>theater arts to the developmental levels of students in preK-12, including the following:</u></p> <p><u>8 VAC 20-542-520. Visual arts preK-12.</u></p> <p><u>The program in visual arts preK-12 shall ensure that the candidate has demonstrated the following competencies:</u></p> <p><u>2. Understanding of the knowledge, skills, and processes for teaching art appropriate to the developmental levels of students in preK-12 including the following areas:</u></p> | <p><u>levels [and academic needs] of students in preK-12, including the following:</u></p> <p><u>8 VAC 20-542-520. Visual arts preK-12.</u></p> <p><u>The program in visual arts preK-12 shall ensure that the candidate has demonstrated the following competencies:</u></p> <p><u>2. Understanding of the knowledge, skills, and processes for teaching art appropriate to the developmental levels [and academic needs] of students in preK-12 including the following areas:</u></p> | |
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Public comment

Please summarize all comments received during the public comment period following the publication of the proposed stage, and provide the agency response. If no comment was received, please so indicate.

A copy of public comment received regarding the Proposed Regulations Governing the Review and Approval of Education Programs in Virginia (8 VAC 20-542-10 et seq.) is attached.

| Commenter | Comment | Agency response |
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| See attached. | <p>The following is a summary of public comment received by topic. Comments regarding Speech-Language Pathology Assistants also are included in the proposed revisions to the proposed <i>Regulations Governing the Licensure of School Personnel (8 VAC 20-22-20 et seq.)</i>.</p> <p>8 VAC 20-542-10. Definitions Comments Received: 2</p> <p>1) Recommend change in definition of “field experiences”</p> | <p>In response to public comment, the following changes were made to the proposed regulations:</p> <p>8 VAC 20-542-10. Definitions</p> <p>1) Definition of “field experiences” revised to include “program components that are conducted in off-campus settings or on-campus settings dedicated to the instruction of children who would or could</p> |

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| | <p>2) Recommend adding definition for “hard-to-staff schools” to conform to changes in the proposed regulations</p> <p>8 VAC 20-542-40. Standards for Biennial Approval of Education Programs Comments Received: 27</p> <p>1) The majority of the comments in this section emphasize the need to delete the requirement for education programs to include “program exiters” in computations of pass rates on assessments and other program approval accountability measures. Respondents assert that due to a variety of reasons individuals may choose to discontinue a program. Therefore, institutions should not be penalized and only those individuals designated as program completers should be included in the counts.</p> <p>2) Deletion of Praxis I Assessment as a requirement for entry into teacher preparation programs recommended by several respondents. This requirement is viewed as “a burdensome testing requirement for Virginia students.” Respondents cite potential “burdens” such as financial and administrative impact on students and universities as reasons for deleting the requirement.</p> <p>3) Deletion of requirement for candidates to participate in placements in hard-to-staff schools throughout their program experiences requested by nearly a third of respondents</p> | <p>otherwise be served by school divisions in Virginia, or accredited non-public schools, and are accredited for this purpose by external entities such as regional accrediting agencies...”</p> <p>2) References to “hard to staff schools” removed throughout the proposed regulations and replaced with more inclusive language</p> <p>8 VAC 20-542-40. Standards for Biennial Approval of Education Programs</p> <p>1) Requirement maintained to include “program completers” and “program exiters” in this section of the proposed regulations.</p> <p>2). Language added to require that candidates “take” rather than “pass” entry-level competency assessments prescribed by the Virginia Board of Education for Virginia teacher education programs; language regarding documentation of tutorial assistance on Board of Education prescribed entry-level assessments revised in this section to comply with language in the <u>Code of Virginia</u>.</p> <p>3) Reference to “hard to staff schools” deleted throughout the proposed regulations and replaced with the following more inclusive language: “Evidence of opportunities for candidates to participate in diverse school settings that provide experiences with populations that</p> |
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| | <p>4) Additional resources and personnel recommended to support the requirement for employer satisfaction/follow-up surveys on graduates of teacher education programs</p> <p>5) Delete requirement for evidence of contributions to prek-12 student achievement by candidates completing and exiting a program</p> <p>6) Suggestions of ways to address “highly qualified” special educators through establishment of partnerships between institutions of higher education and school divisions provided</p> <p>8 VAC 20-542-80. Professional studies requirements for early/primary education, elementary education, and middle education</p> <p><u>Note:</u> A complete set of comments on this topic are included in the summary table for <i>Regulations Governing the Licensure of School Personnel (8 VAC 20-22-20 et seq.)</i>.</p> | <p>include racial, economic, linguistic, and ethnic diversity throughout the program experiences.”</p> <p>4) No action taken on this recommendation. Responsibility lies with the education program to provide necessary personnel and resources to support follow-up of graduates.</p> <p>5) Deleted the word “exiting” throughout the proposed regulations in reference to provision of evidence of contributions to prek-12 student achievement and evidence of employer job satisfaction with candidates completing a program</p> <p>6) Professional education programs to include as part of biennial accountability measures documented evidence of partnerships reflecting collaboratively designed program descriptions based on identified needs of the preK-12 community.</p> <p>8 VAC 20-542-80. Professional studies requirements for early/primary education, elementary education, and middle education</p> <ul style="list-style-type: none"> • Revised language to state the following: “structured and integrated field experiences for student teaching to require at least 300 clock hours of experiences for initial programs, (including early exposure to prek-12 classroom experiences) to include a minimum of 150 clock hours of directed student teaching requirements” • Professional studies: to add language throughout the proposed regulations to include the terms “student academic needs” and “visual and performing arts,” and add an “s” to the word “relationship” as used with “relationship among |
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| | <p>8 VAC 20-542-130. Professional studies requirements for prek-12 endorsements, special education, secondary grades 6-12 endorsements, and adult education. Comments Received: 23</p> <p><u>Note:</u> A complete set of comments on this topic are included in the summary table for <i>Regulations Governing the Licensure of School Personnel (8 VAC 20-22-20 et seq.)</i>.</p> <ol style="list-style-type: none"> 1) Respondents overwhelmingly requested that competencies required for coursework in Foundations of Education be offered as a separate course. 2) Add coursework on Instructional Design Based on Assessment Data Classroom Management <p>8 VAC 20-542-470 Special Education – special education adapted curriculum K-12 Comments Received : 1</p> <ol style="list-style-type: none"> 1) Substitute the word “aligned” for the word “adapted in special education competencies to be consistent with language used in the special education assessments <p>8 VAC 20-542-480 Special Education - speech-language pathology assistants prek-12. Comments Received: 32</p> <p><u>Note:</u> A complete set of comments on this topic are included in the summary table for <i>Regulations Governing the Licensure of School Personnel (8 VAC 20-22-20 et seq.)</i>.</p> <ol style="list-style-type: none"> 1) The majority of respondents opposed the proposal to add the endorsement for a speech-language pathology assistant. Primary | <p>assessments...” in the methods sections as appropriate.</p> <p>8 VAC 20-542-130. Professional studies requirements for prek-12 endorsements, special education, secondary grades 6-12 endorsements, and adult education.</p> <ol style="list-style-type: none"> 1) Maintain competencies from current regulations for Foundations of Education 2) Competencies added regarding Instructional Design Based on Assessment Data and Coursework on Classroom and Behavior Management. <p>8 VAC 20-542-470 Special Education – special education adapted curriculum K-12</p> <ol style="list-style-type: none"> 1) The word “aligned” substituted for the word “adapted in special education competencies to be consistent with language used in the special education assessments <p>8 VAC 20-542-480 Special Education - speech-language pathology assistants prek-12.</p> <ol style="list-style-type: none"> 1) Deleted proposed new endorsement requirements for speech-language pathology assistants |
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| | <p>concerns focused on competencies possessed by individuals with only a bachelor’s degree in speech-language disorders; reduced quality of services to be provided; lack of clarity in delineation of roles and responsibilities of the assistant, as well as the increased burden of supervision to be placed on the supervising speech-language pathologist.</p> <p>2) Number of clock hours required in clinical practice cited as being too high for bachelor’s level speech-language pathology candidates to obtain.</p> <p>3) Use of guidelines approved by the American Speech-Language-Hearing Association for determining roles and responsibilities of speech-language assistants provided, including a description of the guidelines</p> <p>8 VAC 20-542-590. Special education speech-language disorders prek-12. Comments Received: 23</p> <p><u>Note:</u> A complete set of comments on this topic are included in the summary table for <i>Regulations Governing the Licensure of School Personnel (8 VAC 20-22-20 et seq.)</i>.</p> <p>1) An overwhelming majority of respondents favorably addressed the issue of moving the special education speech-language disorders prek-12 endorsement to the pupil personnel services support section of the regulations.</p> <p>Respondents expressed a desire to include in the state licensure endorsement, the speech-language pathology assistant, “provided that they are supervised by a masters level SLP.”</p> | <p>2) Deleted proposed new endorsement requirements for speech-language pathology assistants</p> <p>3) Deleted proposed new endorsement requirements for speech-language pathology assistants</p> <p>8 VAC 20-542-590. Special education speech-language disorders prek-12.</p> <p>1) Special education speech-language disorders prek-12 endorsement moved to pupil personnel services support section of the proposed regulations</p> <p>Proposed endorsement for speech-language pathology assistants deleted from proposed regulations</p> |
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All changes made in this regulatory action

Please detail all changes that are being proposed and the consequences of the proposed changes. Detail new provisions and/or all changes to existing sections.

NOTE: The current regulations are proposed for repeal (8 VAC 20-541-10 et seq.) and new regulations (8 VAC 20-542-10 et seq.) are being promulgated. Changes proposed and consequences of the proposed changes are included in the section noted below and in the section on “Changes made since the proposed stage.”

| Current section number | Proposed new section number, if applicable | Current requirement | Proposed change and rationale |
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| Repealed | 8 VAC 20-542-10 et seq. | Repealed. | Due to significant proposed revisions to the <i>Regulations Governing Approved Programs for Virginia Institutions of Higher Education</i> , (8 VAC 20-541-10 et. seq.), Effective July 1, 2001, the Board of Education proposes to promulgate new <i>Regulations Governing the Review and Approval of Education Programs in Virginia</i> (8 VAC 20-542-10 et. seq.). |
| None | 8 VAC 20-542-40; 8 VAC 20-542-50 | <p>Evidence of a “critical mass” of candidates as a determinant for biennial approval of education programs</p> <p>“Evidence of increased candidate enrollment” proposed as one of eight accountability measures to be demonstrated biennially as part of the program approval process.</p> | <p>Deleted from proposed regulations based on Board of Education action at its June 28, 2006, meeting.</p> <p>Deleted due to Senate Bill 687 that “prohibits the Board of Education from conditioning full approval of teacher education programs provided by an institution of higher education on (i) the number of students in individual licensure programs, such as, but not limited to, pre-kindergarten-three, Spanish, music education, high school physics, or other disciplines, or (ii) documented efforts to increase enrollment in such programs,” resulted in a revision to the proposed regulations. During the regulatory review required by the Office of the Secretary of Education it was determined that the revision required by SB 687 would be presented to the Board of Education prior to the regulations continuing the APA.</p> |

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| <p>Repealed</p> | <p>8 VAC 20-542-10</p> | <p>Repealed</p> | <p>Definitions for the following terms have been added: “accredited institution;” “accredited program;” “biennial accountability measures;” “biennial report;” “candidates completing a program;” and “candidates exiting a program.”</p> <p>Definitions for the following terms have been revised: “accreditation;” “candidates;” “diversity;” “education program;” “exceptionalities;” “field experiences;” “full-time faculty;” “governance;” “indicators;” “instructional technology;” “licensing;” “part-time faculty;” “professional education faculty;” “professional education program;” “regional accrediting agency;” and “Standards of Learning for Virginia public schools.”</p> <p>Definitions for the following terms have been deleted: “advanced preparation;” “annual report;” “cultural diversity;” “declaration of admission;” “dispositions;” “global perspective;” “initial teacher preparation;” “inquiry;” “institutional report;” “integrative studies;” “knowledge base;” “performance-based licensing;” “professional community;” “professional development;” “protocol;” “sound professional practice;” “state approval;” “teacher educators;” and “weaknesses.”</p> <p>Definitions were revised to conform with changes in Parts II through VII of the proposed regulations, including specific reference to education programs in Virginia. The definition for “professional education program” was expanded to include institutions of higher education or “another Virginia entity for a defined educator preparation program” with primary responsibility for the preparation of teachers and other professional school personnel.</p> |
| <p>Repealed</p> | <p>8 VAC 20-542-20</p> | <p>Did not exist in 8 VAC20-541-20</p> | <p>New procedures for administering proposed regulations are incorporated in this section, including biennial recommendations to the Board of Education for education program approval ratings. These procedures result in reduction of paperwork for administrators of education programs and the need for extensive program approval reviews conducted by the Department of Education.</p> |
| <p>Repealed</p> | <p>8 VAC 20-542-30</p> | <p>Did not exist in 8 VAC20-541-30</p> | <p>New requirements for accreditation or a process approved by the Board of Education as a</p> |

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| <p>Repealed</p> | <p>8 VAC 20-542-40</p> | <p>Did not exist in 8 VAC 20-541-40</p> | <p>prerequisite to education program approval are described in this section of the proposed regulations. This separation of accreditation from the biennial program approval process represents a significant change in the regulations. The Teacher Education Accreditation Council (TEAC) is added to the regulations as an option for obtaining national teacher education program accreditation.</p> <p>This section of the proposed regulations is new and describes the seven accountability measures required for biennial approval of education programs in Virginia. Candidate progress and performance on prescribed Board of Education licensure assessments and on an assessment of basic skills (as prescribed by the Board of Education) for individuals seeking entry into an approved education preparation program are required.</p> |
| <p>Repealed</p> | <p>8 VAC 20-542-50</p> | <p>Did not exist in 8 VAC 20-541-50</p> | <p>This section of the proposed regulations is new and contains requirements describing the application of the standards for biennial approval of education programs in Virginia. The following key elements are included in this section: 1) program accreditation as a prerequisite to program approval; 2) education program candidates' passing rates not to fall below 70 percent biennially for individuals completing and exiting the program; 3) development of biennial accountability measures for partnerships and collaborations based on preK-12 school needs to be reviewed and approved by the Board of Education; and 4) designation of one of three ratings for program approval (approved; approved with stipulations; approval denied).</p> |
| <p>Repealed</p> | <p>8 VAC 20-542-60</p> | <p>Did not exist in 8 VAC 20-541-60</p> | <p>This section of the proposed regulations is new and contains standards to be included as part of the Board of Education approved accreditation process. The process replaces standards required under the current <i>Regulations Governing Approved Programs for Virginia Institutions of Higher Education</i> (8 VAC 20-541-10 et seq.), effective July, 2001.</p> |
| <p>None</p> | <p>8 VAC 20-542-70 through 8 VAC 20-542-600</p> | <p>Did not exist in 8 VAC 20-541-10 et seq.</p> | <p>The competencies in the 1998 <i>Regulations Governing the Licensure of School Personnel</i> were modified and moved to the proposed <i>Regulations Governing Approval of Education Programs in Virginia</i>. The competencies more appropriately relate to program approval requirements.</p> |

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| | | | <p>Substantive changes made in the competencies to comply with proposed licensure regulations include the following: 1) an add-on endorsement for Early Childhood for Three- and four-Year-Olds; 2) Competencies in Instructional Design Based on Assessment Data and Coursework on Classroom and Behavior Management added to professional studies requirements; 3) Endorsements in special education-emotional disturbances, special education-mental retardation, special education-severe disabilities, and special education –specific learning disabilities removed and replaced with new endorsements in special education aligned curriculum K-12 and special education general curriculum K-12; and special education speech-language disorders preK-12 endorsement moved to the pupil personnel services support section of the regulations.</p> |
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Regulatory flexibility analysis

Please describe the agency’s analysis of alternative regulatory methods, consistent with health, safety, environmental, and economic welfare, that will accomplish the objectives of applicable law while minimizing the adverse impact on small business. Alternative regulatory methods include, at a minimum: 1) the establishment of less stringent compliance or reporting requirements; 2) the establishment of less stringent schedules or deadlines for compliance or reporting requirements; 3) the consolidation or simplification of compliance or reporting requirements; 4) the establishment of performance standards for small businesses to replace design or operational standards required in the proposed regulation; and 5) the exemption of small businesses from all or any part of the requirements contained in the proposed regulation.

Input has been received from a variety of audiences in the education community to develop the proposed regulations. The requirements were reviewed and developed. However, no specific alternatives other than promulgating new regulations have been considered to meet the purpose of this action.

Family impact

Please assess the impact of the proposed regulatory action on the institution of the family and family stability including to what extent the regulatory action will: 1) strengthen or erode the authority and rights of parents in the education, nurturing, and supervision of their children; 2) encourage or discourage economic self-sufficiency, self-pride, and the assumption of responsibility for oneself, one’s spouse, and one’s children and/or elderly parents; 3) strengthen or erode the marital commitment; and 4) increase or decrease disposable family income.

The proposed new regulations have no potential impact on the institution of the family and family stability.

(A summary of public comments is attached, beginning on the following page.)

| Date | Name | Title & Organization | Comments for Competencies for Endorsement Areas: Speech Language Pathology Assistants |
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| 12/15/06 | Lissa Power-deFur, Ph.D., CCC-SLP | Chair, Department of Education, Special Education, Social Work, and Communication Disorders Longwood University | <p>Although developed with the best of intentions to address the shortage of speech-language pathologists in the schools there are a number of problems with this approach:</p> <ul style="list-style-type: none"> • The required number of clinical observation hours far exceeds those offered in a typical undergraduate only program. Inclusion would require a one-semester placement as a speech-language assistant. This would potentially add a semester to the undergraduate program and will definitely increase costs to the university to staff the observation class. It is not likely that universities will assume these additional costs. • Without comparable regulation governing the roles and responsibilities of speech-language pathologist assistants, in some places in the state, these persons are likely to be assigned the work of a master’s level speech-language pathologists. • The establishment of a bachelor’s level paraprofessional becomes a rank and salary issue for school divisions, when other paraprofessionals are generally high school or associate level personnel. <p>I recommend that this provision be eliminated. In order to address the shortage, continued use of a conditional/provisional license should be used. However, to ensure that these personnel will complete the master’s degree in a timely fashion, this license should only be given to persons who have a bachelor’s degree in communication sciences and disorders. In addition, those holding a license must demonstrate acceptance into a graduate program within one calendar year of receiving the license. (Currently, graduate programs have experience with conditionally licensed speech-language pathologists who are denied admission to graduate school, yet continue to be employed for the length of the three year license.)</p> |
| 12/14/06 | Sally B. Martin | Speech-Language Pathologist, Fairfax County Public Schools | <p>As a Certified Speech-Language Pathologist working in Fairfax County Public Schools, I am deeply concerned about the suggested VDOE endorsement requirements of speech-language pathology assistants (see requirements in letter attached).</p> <p>Speech-Language Pathologists are leaving the school setting because the caseload demands and expectations are becoming unmanageable. I have worked in hospitals, clinics, and a private practice, and am familiar with the caseload demands of these settings. I fear that by turning to SLPAs to cover the shortage of certified speech/language pathologists, that we may eventually dilute our service delivery system, and further contribute to speech pathologists leaving the schools because of increased supervisory demands. Currently, SLPs are staffed at a 68:1 student/clinician ration. How can a certified SLP realistically provide 500 hours of supervision to SLPAs and manage their current caseload? VDOE has stated that SLPs are responsible for all testing, IEP/goal development, consultation with parents, and attendance of</p> |

| Date | Name | Title & Organization | Comments for Competencies for Endorsement Areas: Speech Language Pathology Assistants |
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| | | | <p>meetings. Yet, in order to perform these duties, the SLP must be knowledgeable about all students on caseload. Is it possible to be knowledgeable about all students on a caseload with a SLP supervising a SLPA one day/week (20%)? With the use of SLPAs, how many students will the SLP be responsible for (68 students of his/her own in addition to more students at another site)?</p> <p>The American-Speech-Language-Hearing Association (ASHA) is the governing body that certifies and licenses speech-language pathologists, and has established guidelines for SLPAs. Wouldn't it make more sense for the individual to obtain SLPA certification through an ASHA accredited college/university, much like Certified Occupational Therapy Assistants?</p> <p>I am not averse to using SLPAs under specific circumstances, notably, in schools with large caseloads that cannot be covered by a single SLP. An SLPA in the same building as the full-time SLP could be supervised much more easily. However, SLP caseloads would still need to be reduced to allow for appropriate supervision. Under other circumstances, FSLCA does not recommend the endorsement of SLPA in the Commonwealth Virginia.</p> |
| 12/14/06 | MaryAnn S. Wyatt, M.A., CCC-SLP | Speech-Language Pathologist, Fairfax County Public Schools | <p>This is not an easy issue, and I know that Speech/Language Pathologists are worried that SLPAs will be used to "make-up" for the shortage of SLP's in the Commonwealth. Virginia needs to desperately solve the caseload issue before the SLPA determination is considered. The caseload issue is an ongoing problem, one that I worked on fervently in the 1990's through the Speech and Hearing Association of Virginia with the Virginia Legislature. We came breathtakingly close to reducing caseload to a reasonable amount, with an excellent action plan for gradual reduction. I spent quite a bit of time presenting public testimony giving facts, figures, and public testimony.</p> <p>It is a sad commentary that there has only been a reduction of caseload by only seven students in over 31 years! When I started my career, the caseload in Virginia was 75. It was reduced and then increased again. In the 90's, it was reduced to 70, and then to 68. There has been no movement since!</p> <p>Research by Dr. Laura Justice from UVA strongly supports that children who have language delays and language disorders are at the greatest risk for poor literacy. With all the strides we have made in 36 years in education and speech therapy, it is baffling to me regarding why the caseload issue has not been solved. When children receive the early intervention they need, the literacy rate improves dramatically! Solve the caseload issue, and you will dramatically impact your literacy issues, and the speech therapist shortage. Speech Therapists will want to work in the schools when they know that they are more effective.</p> <p>When I addressed these issues with VDOE through the Virginia</p> |

| Date | Name | Title & Organization | Comments for Competencies for Endorsement Areas: Speech Language Pathology Assistants |
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| | | | <p>Legislature, as the Speech and Hearing Association Vice President (about ten years ago), I found that educators supported the caseload reduction because they had collaborated for years with speech therapists, and realized what promise there is when children receive the help they need. The speech pathologist in the public schools stand side by side with reading teachers, classroom teachers, intervention teams, and principals, to place the emphasis on literacy and improve each student's performance. Please help us change the impetus and finally bring us into the 21st century by shifting the focus to GRADUAL caseload reduction that is clearly FUNDED. I am inspired by my colleagues everyday who work so hard and put their heart and soul into teaching. Virginia isn't just a state that wants to improve test and literacy scores, but represents a real humanitarian effort to treat each child with dignity and hope. Will you help us please....to bridge the gap and support improved speech-language services by caseload reduction? We have a dynamic and wonderful person at the VDOE that we admire who we believe will help us bridge that gap. Her name is Marie Ireland. I am convinced that if we all work together we can exact change that will make a difference in thousands of children across the Commonwealth. If you wish, you may forward this email as well as to others in the VDOE for consideration. I admire the work that our VDOE directors do and I am excited and hopeful that when we roll up our sleeves and work together, we will effect policy change for 2007-2008 and beyond!</p> |
| 12/14/06 | Mr. Wyatt | Husband of Speech-Language Pathologist, Fairfax, Virginia | <p>I'm writing as the husband of a Speech Language Pathologist here in Fairfax County. My wife has been a teacher since getting her degree in Early Childhood Special Education in 1974, and has worked in Fairfax, Arlington, and Prince William counties since 1981. She received her SLP degree in 1995, practiced for two years, took a hiatus from teaching, returned in 2001 as an Instructional Aide in an HI Center, and now has returned as an SLP this fall.</p> <p>I bothered to give you her experience as background info to now indicate how much more paperwork is currently demanded of the SLPs in comparison to 10 years ago. My wife constantly complains that her job is no longer delivering therapy, it is mostly as an evaluator and paper pusher. Therapy has become a poor third in the running to the testing/evaluations and then writing and presenting reports, all of which are professional responsibilities, but take half or more of the time away from delivering therapy to the kids.</p> <p>So now she tells me that the state might certify an SLP assistant who can deliver therapy, but only under the watchful eye of an SLP, and cannot do evaluations or testing without the Master's or their ASLA-CCCs...(which my wife has had for 10+ years also). You know if the SLPAs are approved then in reality, they are going to do the therapy without much supervision and that takes most of the joy away from the SLP's day. Who wants to write</p> |

| Date | Name | Title & Organization | Comments for Competencies for Endorsement Areas: Speech Language Pathology Assistants |
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| | | | <p>evaluations and IEP goals all the time?</p> <p>What the SLPs really need are secretaries!!!!...someone to schlep paperwork, call parents, file reports, etc. AND, you need more SLPs, with a Master's, NOT an SLPA with a Bachelor's. Put more money into scholarships, helping new teachers get certification, help more Master's programs stay afloat. Yes, I know at least we have one here in Virginia. Do we waive all loan paybacks for staying to work in Virginia, or give free tuition for a guarantee to work in-state as in Arizona?</p> <p>I don't think an assistant who can only deliver therapy, and then, only under some supervision of the SLP, is the solution to the problem. Moreover, it takes away therapy time for the SLP, which my wife says is the best part of her job.</p> <p>If you are going to do this, you better require the counties/cities to make a new salary schedule for SLPs, because you are requiring them to supervise assistants without extra pay. It is similar to a classroom teacher with an IA, but if you are asking SLPs for an entry-level master's, and an SLPA for an entry level bachelor's, then you better take the SLPs off the teacher salary scale and give them their own.</p> <p>Actually, my wife says she might just give up being an SLP and become an SLPA if Virginia passes the law and regs. Well, that defeats the purpose of proposing these changes doesn't it? She wants to do therapy, not more paperwork and supervision, and unless SLPAs can be given the paperwork, then SLPs are going to come out worse off than before.</p> |
| 12/15/06 | Carrie Burris | Speech-Language Pathologist, Newport News City Public Schools | <p>As a former school-based speech-language pathologist, I have some fears regarding the VDOE's proposed regulations pertaining to speech-language pathology assistants. Due to the current shortage of speech-language pathologists in the public schools, I am afraid that these SLP assistants will be asked to perform therapy tasks that are beyond their scope of practice (e.g., be completely responsible for a caseload).</p> <p>Below is a copy of ASHA's guidelines pertaining to SLPA's; I would hope that these guidelines would be strictly adhered to.</p> <p>I would like to comment on the use of Speech-Language Pathology Assistants</p> <p>1. What may speech-language pathology assistants do?</p> <p>According to ASHA's Guidelines for Training, Use, and Supervision of Speech-Language Pathology Assistants (PDF format), which apply across all practice settings, a speech-language pathology assistant may conduct the following tasks under the supervision of a speech-language pathologist:</p> |

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| | | | <ul style="list-style-type: none"> • Assist speech-language and hearing screenings (without interpretation) • Assist with informal documentation as directed by the speech-language pathologist • Follow documented treatment plans or protocols developed by the supervising speech-language pathologist • Document patient/client performance (e.g., tallying data for the speech-language pathologist to use; preparing charts, records, and graphs) and report this information to the supervision speech-language pathologist • Assist the speech-language pathologist during assessment of patients/clients • Assist with clerical duties such as preparing materials and scheduling activities as directed by the speech-language pathologist • Perform checks and maintenance of equipment • Support the supervising speech-language pathologist in research projects, in-service training, and public relations programs • Assist with departmental operations (scheduling, record keeping, safety/maintenance of supplies and equipment) • Collect data for monitoring quality improvement • Exhibit compliance with regulations, reimbursement requirements, and speech-language pathology assistant's job responsibilities <p>State laws vary and may differ from ASHA guidelines. Check specific state regulations.</p> <p>2. What is outside of speech-language pathology assistants' scope of responsibilities?</p> <p>According to ASHA's Guidelines for Training, Use, and Supervision of Speech-Language Pathology Assistants (PDF format), a speech-language pathology assistant may not perform the following tasks:</p> <ul style="list-style-type: none"> • May not perform standardized or nonstandardized diagnostic tests, formal or informal evaluations, or clinical interpretation of test results • May not screen or diagnose patients/clients for feeding/swallowing disorders • May not participate in parent conferences, case conferences, or any interdisciplinary team without the presence of the supervising speech-language pathologist or other ASHA-certified speech-language pathologist designated by the supervising speech-language pathologist • May not write, develop, or modify a patient/client's individualized treatment plan in any way • May not assist with patients/clients without following the individualized treatment plan prepared by the speech- |

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| | | | <p>language pathologist or without access to supervision</p> <ul style="list-style-type: none"> • May not sign any formal documents (e.g., treatment plans, reimbursement forms, or reports; the assistant should sign or initial informal treatment notes for review and co-signature by the supervising professional) • May not select patients/clients for service • May not discharge a patient/client from services • May not disclose clinical or confidential information either orally or in writing to anyone other than the supervising speech-language pathologist • May not make referrals for additional service • May not counsel or consult with the patient/client, family or others regarding the patient/client status or service • May not use a checklist or tabulate results of feeding or swallowing evaluations • May not demonstrate swallowing strategies or precautions to patients, family, or staff • May not represent himself or herself as a speech-language pathologist. <p>In closing, I feel that the shortage of fully qualified school-based speech-language pathologists is due to their low salaries. To paraphrase the movie <i>Field of Dreams</i>: If you pay them, they will come!</p> |
| 12/15/06 | Carol Dudding, Ph.D. | Graduate Program Coordinator, Longwood University | <p>I would like to take the opportunity to provide feedback on the proposed licensure changes in the area of speech language pathology assistants. I am an ASHA certified speech language pathologist who has been working in the state of Virginia for more than 17 years. I am also a faculty member in a graduate degree program in Virginia. I am responding in the capacity of a certified licensed professional and not as a representative of the university program.</p> <p>In reading the proposed changes, I am concerned that:</p> <ol style="list-style-type: none"> 1. Current bachelor's level training programs do not provide clinical education regarding the evaluation and treatment of children school-based speech-language pathologists are serving, such as dysphasia (swallowing disorders), apraxia, autism, traumatic brain injury, etc. I do not see the opportunity for students to gain 500 hours of clinical education as an undergraduate. 2. The proposal did not detail the supervision requirements. What level of supervision and by who is required? Can the assistant be assigned a caseload? 3. The duties and responsibilities of the assistant were not clearly defined. As you know, ASHA has detailed guidelines and expectations regarding use of assistants. I am concerned that an ASHA certified SLP may risk violating ASHA Code of Ethics if these issues are not clearly defined. |

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| | | | 4. I am unsure as to how SLP assistants will be compensated. They will hold a BA or BS degree and yet may be paid in accordance with other paraprofessionals that may or may not have a college degree. I imagine this may be a sensitive issue in recruiting and maintaining qualified individuals. |

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| | Michael Behrmann, Ed.D. | Faculty, College of Education and Human Development, George Mason University | These faculty of George Mason University recommend that wording on the proposed endorsement for “teachers of children with disabilities in an adapted curriculum” change the word “adapted” to the word “aligned” to match state assessment terminology. |
| | Michael Behrmann, Ed.D. | Faculty, College of Education and Human Development, George Mason University | These faculty of George Mason University support a requirement of competence in “orientation and mobility” be added to the VI teacher endorsement. |
| | Michael Behrmann, Ed.D. | Faculty, College of Education and Human Development, George Mason University | These faculty of George Mason University recommend that all general education teacher licensure programs require competency in characteristics, legal issues and instructional strategies for children with disabilities. |
| 12/15/06 | Lissa Power-deFur, Ph.D., CCC-SLP | Chair, Department of Education, Special Education, Social Work, and Communication Disorders Longwood University | I have some comments on special education and cultural linguistic diversity. The need for general education teachers to be prepared to teach students with disabilities and cultural-linguistic diversity has been discussed and affirmed by educators in Virginia and nationwide. The revision of these regulations is a perfect opportunity to add this requirement. However, this should be added without deleting another requirement. Rather, the cap in the number of hours should be increased. |
| 12/8/06 | Lynn H. Wolf, Ed.D. | Director of Teacher Education, Averett University | Education programs should be allowed to incorporate behavior management into other courses such as curriculum, instruction, and methods as we now do, and not be required to become a separate course. -Behavior management must be taught throughout the program, in courses in which its relevance will make it the most meaningful. |

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| | | | <p>We have had excellent success doing it this way for many years and do not wish to alter a method that already works so well.</p> <p>A decrease in the number of program hours of education coursework should not be required. -We have a difficult time being able to include all the necessary requirements in the hours allowed under the current guidelines, and we feel strongly that a decrease in that number would seriously hinder the effectiveness of our education program.</p> <p>Thank you for your careful consideration of our recommendations. Averett University has a long-standing reputation for graduating high quality teachers and unwarranted changes in program requirements such as those discussed above will make this much more difficult to do. We would appreciate your vote against these changes.</p> |
| 11/29/06 | Randy Bell, Ph.D. | Associate Professor, Curry School of Education University of Virginia | <p>Additionally, I am concerned that requiring only one generic curriculum and instruction course for initial teacher licensure instead of a true science methods course will not be adequate preparation for science teachers. There are just too many effective science-specific methods that will not be covered in a generic methods course (e.g., inquiry, demonstrations, conceptual change, the 5E model, field trips, laboratory approaches, lab-related safety, disposal of hazardous waste, etc.). Not to mention that the cornerstone of the National Science Education Standards (and a highlight of the Virginia Science Standards of Learning) is instruction about the nature of science. It is highly unlikely that a person unfamiliar with science pedagogy will be able to teach this nuanced subject.</p> |
| 12/12/06 | Jack Robinson | Department of Early Childhood, Speech Pathology and Special Education Old Dominion University | <p>I would like to address the section on Instructional Design Based on Assessment Data (Part C page 39 of the Proposed Regulations Governing Licensure) and to second the motion made by Dr. Myran. That motion was to add the following sentence to the end of Part C to read: "It is essential that teachers be prepared in a balanced approach to assessment to include not only skills in assessment of learning, but especially, assessment <i>for</i> learning principles and practices".</p> <p>What is being advocated here is closer attention to and articulation of the day to day use of assessment practices that promote substantive learning in the classroom, the kind of learning that is actually stipulating the SOL. The use of assessment to monitor and especially promote higher level learning such as problem solving and critical thinking has been advocated by almost all major curriculum associations for some time now. Likewise, several states and professional organizations such as NEA, AFT, NCATE, and CCSSO and have focused on holding teachers more accountable for skills in assessment literacy. However, what is unclear about the positions taken by these professional organizations and in the state licensure regulations is the extent to which they apply to teachers' assessment skills to promote student</p> |

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| | | | <p>learning as opposed to those that primarily focus on monitoring or auditing student learning. The latter has been the focus of what educators have historically viewed as the function of assessment and tends to be the framework most teachers use when thinking about assessment in their classroom. Terms such as formative assessment or diagnostic assessment have likewise been interpreted as referring almost exclusively to teacher use of assessment information. Unfortunately, that limited view of assessment fails to avail itself of a significant and ever growing body of knowledge about the effective use of assessment to more readily promote student learning, an area which has come to be referred to as "assessment <i>for</i> learning."</p> <p>The use of assessment to promote learning is the focus of assessment for learning principles and practices. It is not the intent of this brief position paper to even begin to address the rather large research base that supports these practices, but a few pieces of information may be of note. A major review of over 250 studies of these practices by Black and William in 1998 found an average effect size of .5 to .7 on enhanced student learning for such approaches and those results were consistent across all grade levels, all subject matter areas, and across all the countries in which the studies were conducted. Their work was part of the United Kingdom's "Assessment Reform" movement that has been on going for more than a decade now. Grant Wiggins' text on "Educative Assessment" published in that same year and his text on "Understanding by Design" likewise take the view that teachers primarily need to know how to use assessment to accomplish learning intentions. The focus of the Educational Testing Service's (ETS) Biannual conference on major issues in assessment in October of 2005 was on assessment to promote learning. The November of 2005 issue of <i>Educational Leadership</i>, the flagship publication of ASCD, was entirely devoted to assessment to promote learning as was the major publication of the American Association for Staff Development in December of 2005. Dylan William just finished a three year appointment leading a major ETS initiative on assessment for learning. The Assessment Training Institute (ATI) developed by Richard Stiggins and his colleagues was just purchased by ETS this past spring and signals that organization's continued commitment to this perspective on assessment. In fact the ETS/ATI web site clearly states the function of that new branch of ETS:</p> <p>"The Assessment Training Institute was founded in 1992 in Portland, Oregon by Rick Stiggins and purchased by Educational Testing Service in 2006. Our work is guided by the belief that involving students in the classroom assessment process puts them in touch with the skills they need to take responsibility for their own progress and success. ETS is focused on building students' confidence in themselves as learners, as well as supporting teachers as they face the challenges of developing quality day-to-day classroom assessment."</p> |

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| | | | <p>The focus of most curriculum organization as well is either on a balanced approach to assessment literacy or more often on assessment for learning principles and practices.</p> <p>My continuing work with teachers over the past eight years has likewise found significant benefits from the use of assessment for learning principles and practices. However, that work has also made it clear to me that changing teachers' perspectives and assessment practices takes time and that the current preparation of teachers in assessment literacy does not readily support the kinds of changes needed. For those reasons I think a pointed and explicit statement is needed in the regulations that points teachers' development of assessment literacy skills in the direction that we know will substantially benefit student learning and development. Furthermore, that requirement should be applicable to not only K-6 licensure but to 6-12 licensure as well.</p> |
| 11/30/06 | Brenda G. Gilman, Ph.D. | Chair, Education Department, Randolph-Macon College | <p>Regarding classroom management as a separate course, we address classroom management as a very important topic directly in our two anchor courses which include structured observation of classroom management in field work. Additionally, in our methods courses, students study an array of theories and applications of effective classroom management models. We currently integrate classroom management across the professional educational studies courses and have met with great success. Student teachers and graduates of our program have sound understanding and application of classroom management. Our graduates, who are acknowledged as exemplary teachers in various venues, are recognized for outstanding instructional and classroom management practices.</p> |
| 12/15/06 | Dr. Mavis Brown | Associate Professor of Education, University of Richmond | <p>As a teacher educator at the University of Richmond, I would like to suggest edits to the licensure regulations for both preK-3 and preK-6 to more appropriately address the preschool competencies.</p> <ul style="list-style-type: none"> • increase the professional studies cap of 24 semester hours to 28 semester hours for the purpose of including a specialized course in principles and procedures of early childhood education (preK-3 or preK-6). • the student teaching experience should require a portion of the 300 clock hours to be spent in direct teaching in a preschool or kindergarten classroom. <p>Rationale: A growing body of research indicates that early childhood education helps children to succeed in school and life. High quality early childhood programs must be staffed by knowledgeable teachers who are well grounded in a myriad of successful practices and tools that will enable them to ensure high-quality curriculum and instructional practices that foster young children's learning and development in all areas.</p> |
| 12/7/06 | Dr. William | Dean, Darden | Thank you for allowing me to appear tonight to comment on the |

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| | Graves | College of Education, Old Dominion University | <p>proposed program approval and licensure regulations. I also want to compliment the Department of Education and the Board for proposing these changes in the regulations. For the most part, these changes will strengthen programs in teacher education and school administrator preparation in Virginia as well as provide more opportunities for children to enjoy and benefit from the schooling process.</p> <p>My comments tonight focus on a need for the Board of Education to assure the public and school divisions that all educators who matriculate through an education program or take courses that provide additional endorsements meet the standards of the Commonwealth. Our current regulations and the proposed regulations fail to provide this assurance.</p> <p>For a Virginia college or university to recommend to the Department of Education that a prospective teacher, principal, counselor or education professional receive a license to practice, the university’s program must be approved by the Virginia Department of Education. We have 37 such programs in Virginia which meet the Department’s standards.</p> <p>However, Virginia colleges and universities are not the only institutions offering education programs and courses in Virginia to its citizens. Institutions from Alabama, Florida, Massachusetts, Illinois, and other states offer programs and teach courses in buildings across the Commonwealth in which prospective educators and current teacher enroll. Because these institutions are not based in Virginia, they are not required to meet Virginia’s program approval standards. Consequently, Virginia citizens who enroll in programs of these institutions will not benefit from the intended effects of the proposed program approval changes in teacher education and in school administrator preparation programs.</p> <p>I want neither to reduce competition or impede commerce. I want the proposed regulations to be amended to require that any institution with a home office or main campus that is not geographically located in Virginia and that offers a program for licensure or endorsement of Virginia educators in Virginia to meet the same program approval standards as all Virginia based programs are required to meet. Virginia educators, prospective educators, and the children of Virginia deserve no less.</p> <p>My institution offers its teacher education program using distance education technologies in other states. But other states, for example, Georgia, require that our offerings meet Georgia standards. Georgia does not view this type of a requirement as impeding commerce or restricting competition. It views its requirements as protecting children and its own investment in the schools of Georgia.</p> |
| 12/7/06 | Kristi Planck Johnson, Ph.D. | Associate Professor of | Foundations of Education is an essential course for all future educators. We must know about our history, sociology, |

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| | | Education, Marymount University | <p>philosophy, and international education issues and information. Without these ingredients, an educator is not grounded in ways that provide solid thinking for all teachers.</p> <p>We must preserve our Foundations of Education! Thank you for your consideration</p> |
| 12/6/06 | Molly Back | Student, Radford University | <p>I am currently a Junior at Radford University and an Elementary Education major. I recently completed a Foundations of Education course and truly believe it is one of the best courses offered in this program. I was extremely unprepared going into this class. I had no idea that it would include so much work, but I was pleasantly surprised at the amount I learned. This class offered so much room for my opinions as a student, and I was able to see much more clearly into the world. It was the first class that I'd taken in which we actually learned how to deal with social issues within the classroom, versus standard teaching practices. We dealt with issues dealing with race, sexuality, poverty, and much more that we, as future educators, will deal with in the future. Teachers who graduated from Radford University with the kind of education this class offers will know tips and strategies on how to deal with these issues instead of ignoring them in their own classrooms. As I mentioned before, the class opened many doors for me, as well as my classmates, to state opinions and views of the world. It was an eye-opening experience in itself. We were also assigned a service-learning project, which gave me my first classroom experience. The instruction I received from this class is priceless and very meaningful, and I can't imagine taking this type of class completely out of the curriculum.</p> <p>Please consider keeping this class and all like it.</p> |
| 12/7/06 | Keith Thomas | Student, Radford University | <p>This has been a key transitional semester for me. The fundamentals "Introduction to Education" class I have been involved with this semester has immersed my thoughts and efforts into education. Immersed not only in my own education, which until recently has been mainly an effort in forming a "well-rounded individual," but in the education of others, how education works, why we educate ourselves, each other, what is expected of educators, the educated, and what an education is. This is the semester I became much more aware of what an education truly is, and why I decided to work towards a career in education. This has been accomplished through the presentation of a wide variety of philosophical ideas, facts about the educational process, and opportunities our society is presented, expects, doesn't think about, and accepts or rejects. Out of this plethora of information, the fundamentals ("background" or basic knowledge) of education, I have chosen subjects that I feel have affected me greatly and will benefit me immensely in my teaching career.</p> <p>Foremost among these concepts that "stand out" to me, which means they make me wish to learn more about, is the idea of hidden curriculums. I have a seemingly intrinsic characteristic to question authority. In my childhood, and as I approach forty years of age, this has been expressed to me many times over by</p> |

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| | | | <p>comments on my “bad attitude,” what I now realize is an unwillingness to simply accept “that’s just the way it is” as the unimpeachable truth. Questioning authority because of misunderstanding or ignorance of “why things are,” the status-quo, can be a frustrating and infuriating circumstance, and can be expressed in many ways. Through “making the familiar strange” i.e.: seeing other perspectives, this fundamentals class has made me aware that the hidden curriculum is a series of lessons that society teaches covertly and subliminally, often so much so that the teacher is ignorant that the lesson occurs. These are powerful, powerful lessons about societal hierarchy, the purpose of society, and heavily influence social class reproduction throughout the educational process, and far beyond school grounds. According to the article, “The Seven Lesson Schoolteacher” by John Taylor Gatto, these lessons influence students towards emotional and intellectual dependency, create provisional self-esteem, reinforce class position, cause confusion, indifference, and submission to control. In some cases, such as my own, continuous control, in which an individual feels they have no “voice”, can lead to an aversion to authority, a fact which influences me heavily towards the concept of a democratic classroom. This means students under my tutelage will be challenged to create their own goals, expectations, and consequences, while performing up to or better than the high expectations set by those charged with such tasks.</p> <p>The knowledge of “hidden curriculums” is the first step in being able to teach children that a true education is one in which the student uses gained knowledge to propagate ideas, ideals, and concepts they feel are valuable, worthwhile, and worthy of gaining more knowledge of, not simply to recite facts in order to receive a tangible grade, reward, or salary. Anyone, regardless of social class, race, sex, sexual orientation, religious belief, ability, (physical or cognitive) or any characteristic that may create a social grouping or labeling, has the right to the intrinsic rewards of an education. This leads to the second fundamental concept I will be incorporating in my teaching career, learned from this class; what an education is for.</p> <p>The current philosophy of education in the United States is one of essentialism; there being certain lessons that one must know in order to survive, thrive, and be successful. Certain lessons must be taught to everyone, and certain answers must be held as correct by everyone. This philosophy has lead to “cookie cutter” standardization, turning schools into factories tasked with turning out students unchallenged with “what could be”, only with “answer in this manner.” This philosophy is not wholly without merit, but is not, in my opinion or will be in my practice, the sole determining factor. Perennialism, the belief that there are classical lasting lessons, along with the philosophy of social reform, the need to increase knowledge and understanding of each other as humans, should be balanced ingredients in the educational process format. I believe this will lead to empathy and the drive to work together, essentials which I believe the current educational trend</p> |

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| | | | <p>lacks in favor of a society of competition. I believe an education is for “developing the powers of reasoning and judgment” (Webster’s, 621.) This means developing the ability to “see” or understand differing perspectives, attitudes, ideals, and concepts, as well as engraining established scientifically proven facts. Doing so will allow the student to develop social skills and the ability to intelligently make choices and judgments in order to achieve carefully considered goals set by themselves. This is the measure of success; this is what an education means.</p> <p>A final lesson I have learned from this class is one that is vital to a successful teaching career. It does not come from any article, text, group discussion, PowerPoint, or video clip assignments, but from participating in this fundamentals class. It is simply this, a teacher’s enthusiasm and love of teaching, along with the intrinsic reward one receives from education, is contagious, and is reflected, magnified, and appreciated by the students which she (or he) shares the educational process with. A group of students, lead by a teacher “simply going through the motions” will not perform, by anyone’s standards, anywhere close to the level of a class that is accepted for their strengths, challenged to strengthen their weaknesses, and experiences an earnestly enthusiastic teacher that “models positive behaviors;” one that truly believes, acts upon, prepares for, and shares a love of education respectfully with students. This is true of college students, as well as elementary students, as my participation in service learning, part of fundamentals of education class, as well as the class itself, has proven beyond doubt to me. Through learning and participation in fundamentals of education class, the power of a “bad attitude” can be harnessed and used in a powerfully positive manner while sharing the educational process with my own students in the future.</p> |
| 12/7/06 | John Stroup | Ph.D. Candidate- Curry School of Education Research Fellow-Federal Executive Institute University of Virginia | <p>I am writing to dissuade you from removing the requirement that teachers take a Foundations of Education course and instead take a data management course.</p> <p>I strongly support the increased hours of preparation before teachers begin teaching, and I believe that new teachers will learn how to use data to inform their teaching during this time. However, I can’t see how they will have the opportunity to inquire into the great history and philosophies of education outside the academy. We want teachers with depth of knowledge and the skills to inquire into the difficult issues that face student learning in the classroom. We know that teaching requires the imagination to understand how to deliver content, promote critical thinking, and basic educational skills to young people of various ethnic, cultural, and economic backgrounds.</p> <p>Using data to inform teaching does absolutely nothing if you do not understand to whom you are delivering curriculum and instruction.</p> |

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| | | | <p>I strongly encourage you to rethink this proposal. What you should be proposing is that teachers get both a deep understanding of the foundations of education as well as in depth practice at using data to inform your teaching.</p> <p>Do not make this critical error and think that you are helping teachers learn something in the classroom that they should be learning on the job.</p> |
| 12/8/06 | Lorrie T. Viars | Student, Elementary Education, Radford University | <p>Hello. My name is Lorrie Viars and I am currently an elementary education major at Radford University. I have recently heard about the idea to delete the Foundations of Education courses out of the system, that they would no longer be required for teachers. I believe that this idea is completely bogus. I believe that the course should be required and should be left in the system. In this class, I have learned a great deal about how to structure my classroom. It has really helped me to see that I need to not expect that everything will be great and everyone will get along, it has showed me that people are different and we need to see that. The course is called "Foundations" of Education...doesn't foundation basically mean the beginning of something or the building blocks? That's exactly what is has been for me. It has been the building block of a soon coming and great teaching career for me. It has made me think about things that I would have never thought of had I never taken the course. Also, you need to think about the teachers that you would be putting out of jobs. Do you want them to be unemployed or would you rather them be able to have a stable and steady job? Again, I really enjoyed the class and I hope that you will take my short excerpts into consideration and really stop and think about what you could be doing to our future teachers. You would be taking away the building blocks to their future, the beginning of their career and also you would be putting people out of jobs. Please carefully reconsider your action to remove the Foundations of Education course.</p> |
| 12/8/06 | Kollene Alicia Sistek | Student, James Madison Univeristy | <p>Keep Foundations of Education as a requirement for teacher licensure. Per completing this course myself this semester, I feel EDUC 360 was a meaningful learning experience for me and I think future teacher education students in Virginia should have the opportunity to take such a course. The material that was covered is essential for us to understand before we face these things in the classroom.</p> <p>This coursework is essential for the development of reflective, professional teachers through the cultivation of historical perspectives and the ability to place school enterprises within larger social, cultural and political contexts. Without this course, I would have NEVER been exposed to this material in such a fashion. We need to focus on making better well-rounded teachers who are sensitive to these things.</p> <p>I have learned in this class how to tactfully approach subjects that have often been labeled as taboo.</p> |

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| | | | <p>Virginia and its student population are becoming increasingly diverse. Foundations coursework is one of the primary places for prospective teachers to learn about/wrestle with the question of what it means to teach in a culturally diverse society.</p> <p>On one last note, one reason why teacher retention rates are low is because they do not understand the ways in which classrooms are part of the larger institution of public school and how the school and society relate. Foundations coursework helps prospective teachers make such connections. As well as show us what it is really going to be like when we get in there. Out of the 25 courses I have taken thus far at James Madison University, this course I can say has prepared me the most.</p> |
| 12/8/06 | Dr. Chapman Hood Frazier | President of the Virginia Association of Teachers of English | <p>As one of the state’s primary professional organizations devoted to the teaching of English and Language Arts, the Virginia Association of Teachers of English would like to express our opposition to the current licensure proposal to eliminate the Social Foundations requirement for future teacher educators.</p> <p>First of all, the Social Foundations requirement provides our teachers-in-training with a solid grounding in the history, sociology, and multi-cultural and contemporary educational issues that inform our profession. Therefore, the current proposed changes to eliminate these requirements would seriously jeopardize the opportunity for our future teachers to understand the development and history of our profession as well as examine the critical issues that face teachers today.</p> <p>In addition, the Virginia Association of Teachers of English is closely affiliated with Virginia College English Educators, and many of our members are directly involved in teacher licensure programs. Since we, as English educators, align our teaching pedagogy with National Council Accreditation in Teacher Education (NCATE) and National Council of Teachers of English (NCTE) goals, the decision to eliminate the Social Foundations of Education could adversely affect our ability to meet our professional standards. The following standards are currently addressed through the teaching of Social Foundations in our teacher licensure programs:</p> <p>Social Foundations courses are currently required to meet several of our National Council of Teachers of English (NCTE) and (NCATE) standards including:</p> <p>Candidates improve professional knowledge and attitudes towards the field of education by: 2.2 Use ELA (English Language Arts) extensively and creatively to help their students become more familiar with their own and others’ cultures.</p> |

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| | | | <p>2.5 Make meaningful and creative connections between ELA curriculum and developments in culture, society and education.</p> <p>2.6 Plan and carry out frequent and extended learning experiences that integrate arts and humanities into the daily learning of their students.</p> <p>Candidate knowledge of curriculum practices 3.13 Use both theory and practice in helping students understand the impact of cultural, economic, political, and social environments on language.</p> <p>Pedagogical Standards 4.1 Understand the purposes and characteristics of different kinds of curricula and related teaching resources and select or create instructional materials that are consistent with what is currently known about student learning in ELA.</p> <p>4.3 Work with teachers in other content areas to help students connect important ideas, concepts and skills within ELA with similar ones in other disciplines.</p> <p>4.4 Create opportunities for students to analyze how social context affects language and monitor their own language and to monitor their own language use and behavior in terms of demonstrating respect for individual differences of ethnicity, race, language, culture, gender, and ability.</p> <p>Therefore, the Virginia Association of Teachers of English would like to go on record to voice our opposition to the proposed change to eliminate the Social Foundations of Education from the teacher education licensure requirements.</p> |
| 12/8/06 | Christina Poirier | Student, Radford University | <p>My name is Christina Poirier and I am currently in a Foundations of Education course at Radford University. I believe that I am more prepared to be a fair and understanding teacher after taking this course. This course is the only one offered at Radford University that truly teaches future teachers about topics such as diversity and the history of education. Removing this course would impact the next generation of teachers. Without this course, future teachers will not have a thorough understanding of the background history of their chosen field. They will also miss out on the wonderful opportunity of learning about cultures and lifestyles that may be different from their own. This course is an eye opener. It prepared me to teach and understand children who have a different background than I do. It also reminds future teachers to keep an open mind. A successful teacher is not just a person who knows effective strategies. A life changing teacher is one who tries to learn where a student is coming from. A teacher who truly impacts a student helps that student not only learn spelling and arithmetics, but makes that student feel comfortable in the classroom and the school environment. If future teachers do</p> |

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| | | | not experience a foundations of education course, future students will be impacted and their educations will suffer. |
| 12/8/06 | Larry R. Huffman | Adjunct Instructor Department of Learning, Technology and Leadership Education James Madison University | <p>I would like to speak for the continuation of the requirement for Educational Foundations in our teacher preparation programs.</p> <p>I am a retired elementary principal (31 years) who has been teaching the Foundations of American Education at James Madison University since 1998. I feel that I can speak for this requirement from two different perspectives.</p> <p>First as a former principal, the teachers that I have hired and directed over many years need to be well-grounded in the social, philosophical, legal, cultural, ethical and historical foundations that have made education what it is today. The teachers who have strong preparation, including a comprehensive foundations course, have been more professional, better able to understand the dynamics of working in today's classrooms, and play a strong leadership role on the faculty. They have been able to better examine the implications of their actions on student learning and, most importantly, to demonstrated "reflective practice" and the ability to work with others to accomplish school goals.</p> <p>Speaking as an instructor of the Foundations course, I feel that establishing a strong background in the areas of knowledge, attitude, skills, and leadership provide a solid background for their more detailed methods courses and a real understanding of not only "how to teach" but also the implications and impact of their actions and understandings on student learning. I have been teaching the course long enough to determine that the students who excel in understanding the foundations experience more success when they move to the classroom.</p> <p>I feel strongly that the foundations requirement should be left in the program since it has such a significant impact on the quality of student learning.</p> |
| 12/8/06 | Lynn H. Wolf, Ed.D. | Director of Teacher Education, Averett University | <p>In reacting to the currently proposed changes in program regulations, the Education Department at Averett University would like to recommend the following:</p> <p>Foundations courses should remain as part of the allowed education program offerings. This is a critical and extremely necessary course, the content of which would be difficult to incorporate appropriately or segment into other courses.</p> |
| 12/8/06 | Lisa Rostiser | Student, James Madison University | <p>It has recently come to my attention that Social Foundations of Education is at risk for being cut from the course requirements for teacher education. As a future teacher and past student of that course, I feel it would be to the student's detriment to not require such a worthwhile and valuable course. The material covered in that course helps future teachers develop skills and strategies for</p> |

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| | | | <p>their future work in an increasingly diverse classroom. The foundations taught in that class will help teachers to come up with solutions when faced with confusion or frustration in their future classrooms. In closing, it would be harmful both to the future teachers and their future students to not require Social Foundations of Education for teaching licensure and I sincerely hope the Department of Education will reconsider cutting Social Foundations of Education from the teacher education program.</p> |
| 12/8/06 | Tyson Traver | Student, Radford University | <p>I am a student in one of the EDEF 320 classes at Radford University. I intend to teach high school history upon graduation. When I first started this class, I felt as if it was of no use and was not going to be enjoyable. After a few weeks, I began to understand the message that the class was intended to make. Understanding that the class was about allowing me to enjoy the participation and going to the class.</p> <p>When determining the future of the class EDEF 320, we must determine what we want future teachers to draw from this class. What I have found is the overall message of this class is teachers must create a safe atmosphere that is accepting to all cultures, religions, genders, and sexual orientations and is able to relate to these different types of students without any prejudice in order to teach to them. Awareness instilled in future teachers of diversity is a necessity. It is not ok for the class room to continue to be taught in a Euro-American male type of way. Going through the school system and education program really does not touch on diversity as in depth as this class does. Some future teachers have gone through most of their schooling with little diversity among their fellow peers. We do not want the first time for a teacher to experience an atmosphere that includes many different people to be at their first teaching job.</p> <p>I come from a conservative home. My father is a very homophobic man so some of his views were able to rub off on me. I went in to this class with a very narrow minded view of gays and lesbians. After certain readings and events in class, I have been able to shed my misconception about homosexuals and I am able to look at them as what they are, people that want to be educated and accepted like everyone else. Before this class, I did not have much sympathy for homosexuals. I had heard stories of gays being ridiculed and made fun of, but never thought that that could affect their ability to learn. Hearing testimonials from gay students that went through the public school system changed my view that the treatment homosexuals receive has an affect on their participation in school.</p> <p>Allow this class to continue to be a requirement; the class does build better teachers; showing them how to adapt to the diversity of their classroom. Without this class, a key element of teaching will be overlooked. That element is the ability to connect with every student in one's classroom efficiently enough to teach them curriculum.</p> |

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| 12/12/06 | James S. Kaminsky Ph.D. | Professor of Education Auburn University | <p>Educational professionals working in America’s public schools are responsible for delivering literacy and numeracy to all of our children. But they are also responsible for presenting a learning environment that honors social justice and diversity. The College of Education at Auburn University honors both. Moreover, establishing an educational environment of social justice and diversity is a state-wide priority for all the people of Alabama. It would be a travesty if the great state of Virginia would sanction a program of teacher education that would abolish the one segment of that teacher education program dedicated to making future educators aware of their responsibility for ensuring equal educational opportunity for every child irrespective of their race, class, gender, or disability. Clearly, understanding public education’s obligation for the promotion of liberty, equality, and fraternity in Virginia’s public schools is at least as important, if not more so, than any other skilled administrator and teacher bring to the classroom.</p> <p>It would be a pleasure to assume that the job is done and both social justice and diversity are assured. But social justice and diversity remain our nation’s “undiscovered country.” To turn one’s back on the job yet to be done in the “undiscovered country” of America’s democracy would be unthinkable. Our history cannot be undone but our present and future can be what we make it.</p> <p>Let me add my voice to the petition that would preserve that segment of teacher education devoted to social justice and diversity.</p> |
| 12/11/06 | Gary Whitt | Teacher | <p>I just wanted to take a moment and voice my opinion that our overall teaching programs would lessen in quality if we drop the Foundations of Education course. It's a strong course for us and helps the students make meaning of the rest of the program. Also, I don't think the stand-alone classroom management course will be as meaningful as teaching classroom management within the context of the courses and in student teaching. The de-contextualized concepts would be much less clear.</p> |
| 12/12/06 | Gilma B. Steele | Teacher, Henrico County Public Schools | <p>I recently learned that the Virginia Board of Education is considering removing the Foundations of Education requirement for new teachers. As someone who has benefited from this program, I feel obliged to let you know that I and others see this as an integral part of preparing young teachers for success, not in the classroom, but for successful growth as professionals.</p> <p>One of the growing issues in public education is multi-culturalism; more specifically, how to effectively incorporate education from a multi-cultural perspective into the traditional American curriculum. During my educational training, the Foundations courses were the only classes that directly tackled the issue of multi-culturalism. Everyday, we encounter students of varied</p> |

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| | | | <p>backgrounds. As teachers, we need to know how to effectively approach those differences thereby ensuring success for all students, regardless of their background. The Foundations classes afford aspiring teachers opportunities to examine the issue in-depth.</p> <p>Additionally, when I moved to the United States seven years ago, I knew that I wanted to become a public school teacher but I was very ignorant about the history of the American education system. The Foundations courses provided me with a sound contextual understanding of education in America and its importance in society. In my U.S. History course, I have had students inquire about the origins of the public school system. Using much the information that I learned in my Foundations courses, I was able to provide an informed answer to their questions.</p> <p>Ladies and gentlemen, having personally benefited from this program, I implore you to reconsider your decision to get rid of this invaluable program because it really would be unfortunate if our up-and-coming teachers are deprived of such a vital component of their professional training.</p> |
| 12/14/06 | Dr. Phil Wishon | Dean, College of Education, James Madison University | <p>It is strongly suggested that study of and acquisition of skills and dispositions pertinent to Social Foundations of Education be retained as a licensure requirement.</p> <p>Eliminating this domain as a licensure requirement sends the very unfortunate message that understanding and appreciating the very substantial role of school as a (some would say THE) primary socializing institution in American society, and the extremely consequential role schools play as democratic "levelers" is without merit. In our imperfect society, this is not a message that leads to greater societal understanding and healing.</p> |
| 12/15/06 | Marty Watkin | Adjunct Faculty English and ESL programs J. Sargeant Reynolds Community College | <p>I am writing to lend my support to the teacher movement in support of Social Foundations of Education. Like the others who may have written you, I strongly feel that if we eliminate this requirement for teacher education, we are in effect suggesting either: a) that we are doing an excellent job in the classroom as educators being sensitive to issues of race, class differences and cultural awareness, or b) that we are not convinced that those issues are crucial ones for us as educators. Neither is true.</p> <p>We must continue to keep the SFE requirement. The purpose of SFE is to introduce educators to whatever cultural blind spots they possess, and we all have them, even the best of us. SFE gives educators a safe place to ask questions, discuss issues, and learn facts and statistics that help them understand why we must be culturally sensitive and teach our students to be the same.</p> |
| 12/14/06 | Brenda G. Gilman Ph.D. | President, Virginia Association of | <p>On behalf of the collective membership of the Virginia Association of Colleges for Teacher Education (VACTE), which represents the 37 teacher preparation programs in colleges and</p> |

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| | | Colleges for Teacher Education (VACTE) | <p>universities in the state, I take this opportunity to respond the proposed changes to the <i>Regulations Governing the Review and Approval of Education Programs in Virginia</i> and to the <i>Licensure Regulations for School Personnel</i>. As education professionals who are deeply committed to high quality teacher preparation, we have followed and discussed the effect these proposed changes will have on the preparation of future educators in our programs across the commonwealth.</p> <p>Of great concern is the elimination of the Foundations of Education requirement. This requirement is the cornerstone and anchor of teacher preparation since it provides important and vital information that teaching professionals need in order to understand and become grounded in the profession. As a result of the study of the development of education in this country, teachers have a greater sense of the importance of education as an integral part of our national and state history. It is in a foundations course where students begin to formulate their own thinking about education and address critical issues of school finances, governance, organization, and law, as well as, gaining an in depth perspective of issues related to diversity including cultural and language differences that impact our classrooms daily. It is often in this course that students discern if teaching is a suitable fit for the utilization of their personal characteristics, talents.</p> |
| 12/15/06 | <p>Dr. Eric Bredo</p> <p>Dr. Hal Burbach</p> <p>Dr. Jen deForest</p> <p>Dr. Diane Hoffman</p> | <p>Professor and Coordinator</p> <p>Professor</p> <p>Assistant Professor</p> <p>Associate Professor</p> <p>University of Virginia Social Foundations Program</p> | <p>We are very concerned about the proposed change in required coursework for teacher licensure in Virginia. It has been a tradition in Virginia, as in most other states, for those seeking teacher certification to be required to take one or more courses in Social Foundations of Education. As of 1997, 71% of all teacher preparation programs in the US required such coursework and 90% of the top ten education schools offered doctoral degrees in the field. We understand that there are new pressures on teachers today but believe that coursework in Social Foundations remain vitally important. In fact, it is even more important today with all of the increased pressures placed on teachers.</p> <p>The primary rationale for coursework in Social Foundations is that it gives teachers wider perspective on what they do. Such perspective is important because it enables them to have a fuller understanding of their role or mission. It is all too easy for those in any job to develop tunnel vision, focusing only on the immediate task at hand. This is understandable, but lack of wider perspective can result in teaching and education that are unwise and unethical. To act wisely as well as ethically one has to understand how one’s work relates to others in the school, and how the school’s efforts relate to the wider community. One needs to understand how different efforts fit together or how they get in each other’s way. As social conditions change, teachers also need to be able to think “outside the box” if they are going to adapt successfully. Social Foundations helps in this by making them more sensitive to the social and institutional contexts in which they work and giving them a richer and more varied set of</p> |

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| | | | <p>ideas on which to draw.</p> <p>This point can be summarized by saying that educators must themselves be educated. If we want teachers to foster students who are thoughtful, use good judgment, and are sensitive to the ethical implications of their behavior, these qualities must be also be fostered in teachers. To do so, they must understand the wider meaning of their own work and the way it connects to networks of social relationship extending beyond the classroom. Social Foundations provides the only occasion for teachers to have a chance to do this. Experience in courses like those on the history and sociology of American education introduces them to the character of the American educational system, the way it has been and is related to the wider the community, the difficulties it has experienced and the success and failure of efforts to address those difficulties. Experience in philosophy of education shows them where present educational theories came from and what values and assumptions are embedded in them, as well as introducing them to other ways of thinking about education. Anthropology in education helps give teachers a better understanding of mainstream American culture and the cultures of students and the way they interact in schools. It treats issues related to multi-culturalism with far greater sophistication than most courses having that title.</p> <p>All of these courses provide much wider perspective on teaching than is gained in instructional design or classroom management. Instructional management and design are fine in their place, but it is all too easy for narrow attention to immediate goals to undermine the very thing one is attempting to foster. To avoid these, teachers need to understand the wider meaning or significance of what they are doing. Social Foundations plays a centrally important role in helping them to do so.</p> <p>We sincerely hope that you and the other members of the Professional Licensure Committee and the Advisory Board on Teacher Education and Licensure will see the need for such courses in the education of Virginia’s teachers. We believe they are vital to the Commonwealth. They are vital in just the way its founders thought education vital to its democratic flourishing two hundred years ago.</p> |
| 12/4/06 | Mary E. Andersen | Teacher, Prince William County Public Schools | <p>I recently graduated from the University of Virginia with a Master’s Degree in Social Foundations of Education. While taking the SF course during the preparation for my teaching license, I realized how important Social Foundations is to the basic understanding of the educational process in America. It broadened my horizons and provided invaluable assistance to my comprehension of educational practices.</p> <p>I am currently teaching third grade at J.W. Alvey Elementary in Haymarket, Virginia, for Prince William County. This course has not only prepared me to become a more effective educator, but it</p> |

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| | | | <p>has enabled me to more effectively communicate with my student's parents when I explain how and why about the particulars of their child's education.</p> <p>It is vitally important that teachers learn effective methods and techniques. But an understanding of broad educational goals and contexts in which their students and classrooms exist is necessary for teachers to respond effectively to particular situations. Social Foundations focuses on the "whys" of education. It places in context everything from societal goals to cultural and social trends affecting all aspects of education. This course is critical to effective implementation of the "hows" of classroom practice.</p> <p>I respectfully request that the Virginia Department of Education withdraw the proposal to eliminate Social Foundations of Education from teacher licensure regulations. To do so would be a disservice to not only future teachers, but the children of Virginia.</p> |

| Date | Name | Title & Organization | Comments on Accountability Measure 1: Exiting Program |
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| 12/14/06 | Brenda G. Gilman, Ph.D. | President, VACTE | Program “exiters” should not be included in computations of test scores for required measures used for program acceptance and licensure. Including “program exiters” does not give a true and accurate account of these scores. Scores should represent only those teacher candidates who complete the programs. “Exiters” do not continue in education courses because they have determined that teaching is not suitable for them for a variety of reasons (cannot pass qualifying tests, do not have the level of academic achievement required, do not want to teach, self-determine that teaching is not congruent with their personality and character traits, etc.). Excluding “program exiters” from this data yields a more accurate accountability measure of those completing programs and entering the teaching profession. |
| 12/15/06 | Dr. Joan P. Isenberg | Associate Dean, College of Education and Human Development, George Mason University | I urge that "exiters" be eliminated from computing the pass rates on assessments and other accountability measures. As in other programs of study, there are many reasons why a student may exit a program before completing including poor performance on tests and other measures of accountability. Asking SCDEs to hold and enforce appropriate academic standards may result in students exiting their programs if they do not meet those standards. If we are required to report on those students, it would be a travesty related to accurate and appropriate accountability. |
| 12/12/06 | Dr. Jayne Sullivan Dr. Karen A. Bosch Dr. Malcolm Lively Ms. Ginger Ferris Mrs. Stacey Wollerton | Associate Professor Director of Teacher Education Assistant Professor of Education Assistant Professor Director of Field Experiences Virginia Wesleyan College | Remove program "exiters" from the computation of passing rates on licensure exams and from other measures of accountability such as the requirement for programs to provide evidence of the impact of program completers and exiters upon student learning. I would like to comment on standard which requires information on candidates completing and exiting the program. Candidates could exit the program before they have been prepared in instruction and assessment, and before they are engaged with learners through clinical experiences. Candidates often leave a program before they student teach and so the institution would not have a way to document their impact on preK-12 students. Candidates could be counseled out of a program because they have not been successful. Program providers should not be held accountable for whether or not program "exiters" can impact student learning. |
| 12/15/06 | Dr. Sandi Cohen | Director of Teacher Education, Curry School of | On behalf of my colleagues at the Curry School of Education at the University of Virginia, I would like to make the following comments on the proposed regulations for approved programs in Virginia: |

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| | | Education, University of Virginia | We question the inclusion of "exiters" in the development of pass rates for all programs. Our five-year program allows students to enter the program and to leave at various points without consequence to their B.A. degree. As such, we have many who explore education and for multiple reasons choose not to complete the program. To include them seems pointless and for some IHEs harmful to a true assessment of the program. |
| 12/12/06 | Dr. Marsha Sprague | Director of Teacher Preparation at Christopher Newport University | We request that "exiters" be removed from the computation of pass rates on licensure exams and from other accountability measures such as evidence of impact on student learning. |
| 12/14/06 | Dr. Phil Wishon | Dean, College of Education, James Madison University | The computation of pass rates on licensure exams and other accountability measures such as impact on PK-12 student learning should NOT include data from program "exiters." If programs counsel a candidate out of the profession, that candidate's data is moot and irrelevant, and the only data that should be reported in such instances is the fact that the candidate became a program exiter. |
| 12/14/06 | Dr. Jeff Gorrell | Dean, College of Education and Human Development, George Mason University | I'm writing to express my dismay that the Board of Education would even consider requiring Virginia's schools, colleges and departments of education to count in their computations of pass rates on licensure exams and other measures the students who have exited from their programs. As in other programs of study at colleges and universities, there are many reasons why a student may exit a program before completion, including poor performance on tests and other measures of quality. SCDEs hold and enforce appropriate academic standards in their programs, which may result in some students exiting a program of study if they do not meet the standards. To have and enforce academic standards in teacher licensure programs is an ethical responsibility that SCDEs recognize and embrace. If the same SCDEs are required to keep those students in their computations, it would be a travesty related to accurate and appropriate accountability. |
| 12/15/06 | Leigh L Butler, Ph.D. | Director of Teacher Education, Old Dominion University | <p>I'd like to comment on candidate progress and performance on prescribed Board of Education licensure assessments.</p> <ol style="list-style-type: none"> 1. Programs with small numbers should be allowed to maintain the program. The pass rate should be calculated on 10 or more completers. 2. Candidates who exit the program prior to completing all program requirements should not be calculated into the passing rate. <p>It is the responsibility of the faculty at the higher education institution to provide potential teachers with the opportunity to learn both content and pedagogy. During this time, the individual has the opportunity to complete all program requirements.</p> |

| Date | Name | Title & Organization | Comments on Accountability Measure 1: Exiting Program |
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| | | | <p>However, it is also the responsibility of the faculty at the higher education institution to serve as gate-keepers for those individuals who can not meet the standards of the institution and the Virginia Department of Education. Therefore, the higher education institution should not be penalized by having to calculate the passing rate of the exiter in their programs. Remove program “exiters” from the computation of passing rates on licensure exams. Additionally, program “exiters” should be removed from other measures of accountability as requirements for approved programs to provide evidence of the impact on student learning.</p> |

| Date | Name | Title & Organization | Comments on Accountability Measure 2: BOE Licensure Assessment Requirement |
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| | Michael Behrmann Ed.D. | Faculty, College of Education and Human Development, George Mason University | <p>These faculty of George Mason University recommend that the Praxis I be dropped as a requirement for entry into initial licensure programs. We currently do not use these scores to admit students to our academic programs, only the teacher licensure programs. It is a financial and administrative burden to students and to the universities. All other required licensure tests should remain in effect.</p> |
| 12/15/06 | Lissa Power-deFur, Ph.D., CCC-SLP | Chair, Department of Education, Special Education, Social Work, and Communication Disorders Longwood University | <p>The current requirement that students take Praxis I prior to admission to teacher preparation is a burdensome testing requirement for Virginia students. With the addition of the VCLA, they are taking more tests (with the associated costs) than students who apply for Virginia license and come from out of state or via the alternate route to licensure. This is unfair to students pursuing teacher licensure through a teacher preparation program in Virginia and does not guarantee improved teaching quality. If the Praxis must be retained, please consider adding the GRE and MAT as alternatives in addition to the SAT, as these are tests commonly taken by students entering initial licensure programs at the graduate level.</p> |
| 12/9/06 | Dr. Karen A. Bosch | Director of Teacher Education, Virginia Wesleyan College | <p>My concern is the increase of 80% passing rate for the Praxis II candidates. For small programs but quality ones, if we have two or three or four students and one fails, we drop far below the 80%. It was hard enough for small programs when it was 70%.</p> |
| 12/13/06 | Dr. Tim Reynolds | Education Chair, Roanoke College | <p>Include the Virginia Communication and Literacy Assessment as one of the assessments of basic skills prescribed by the Board of Education for individuals seeking entry into an approved education preparation program.</p> <ol style="list-style-type: none"> a. The Virginia Communication and Literacy Assessment is an assessment which has been recently developed and validated specifically to assess the basic skills of teachers. b. There is research linking teachers' verbal abilities with their |

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| | | | effectiveness and with the impact they have upon student learning. There is no equivalent research base showing how mathematics skills (as assessed on the Praxis I exam but not on the VCLA) impact all teachers' effectiveness and impact on student learning. |
| 12/12/06 | <p>Dr. Jayne Sullivan</p> <p>Dr. Karen A. Bosch</p> <p>Dr. Malcolm Lively</p> <p>Ms. Ginger Ferris</p> <p>Mrs. Stacey Wollerton</p> | <p>Associate Professor</p> <p>Director of Teacher Education</p> <p>Assistant Professor of Education</p> <p>Assistant Professor</p> <p>Director of Field Experiences</p> <p>Virginia Wesleyan College</p> | For Praxis II, use the passing rate on programs with ten or more completers: "Candidate passing rates, reported by percentages, shall not fall below 70 percent biennially for individuals completing and exiting the program." |
| 12/13/06 | Dr. Sharon deFur | Associate Professor, College of William and Mary | <p>I applauded Virginia's SAT or ACT exemption for the Praxis I and encourage that similar exemptions be established for GRE scores. I support the elimination of Praxis I requirements for program approval, given that the VCLA has replaced Praxis I as entry to licensure.</p> <p>Regarding the VCLA that is now required, I urge the DOE and the BOE to adopt SAT, ACT, GRE exemptions for this assessment because of the test cost demands that create a barrier for candidates to enter the field of education, and in particularly special education. High SAT or GRE scores demonstrate candidate's academic skills and the VCLA is redundant and an added burden to candidates who already possess those scholarship skills.</p> |
| 12/14/06 | Lori Korinek | School of Education College of William and Mary | <p>Regarding teacher licensure: I support Virginia's <u>SAT or ACT exemption for the Praxis I and the elimination of the Praxis I requirements for program approval</u>, since the VCLA now replaces Praxis I for licensure.</p> <p>Regarding the <u>VCLA</u> that is now required, I urge the DOE and the BOE to adopt SAT, ACT, GRE exemptions for this assessment. High SAT or GRE scores demonstrate candidates' academic skills.</p> |

| Date | Name | Title & Organization | Comments on Accountability Measure 2: BOE Licensure Assessment Requirement |
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| | | | The VCLA is redundant and an added burden to candidates who already possess those scholarship skills. The time and costs associated with the VCLA discourages students from entering the field of education, especially special education. |

| Date | Name | Title & Organization | Comments on Accountability Measure 3: Field Experiences |
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| 12/15/06 | Lissa Power-deFur, Ph.D., CCC-SLP | Chair, Dept. of Education, Special Education, Social Work, and Communication Disorders Longwood University | I have some comments about the placement of student teachers in public schools. As students can receive excellent experience in their preparation to work in public schools in non-public school settings, the language regarding student teaching and practicum placements should be expanded to allow for placements with school age children in state facilities (DCE, WWRC, DMHMRSAS) and in approved private schools. |
| 11/28/06 | Dr. William Graves | Dean, Darden College of Education, Old Dominion University | <p>This e-mail is intended as a request for a change in the proposed <i>Regulations Governing the Review and Approval of Education Programs in Virginia</i> (8 VAC 20-542-10 et seq.).</p> <p>As Dean of the Darden College of Education at Old Dominion University, I request a change in the definition of field experiences which appears in the above referenced proposed regulations.</p> <p>I want to comment on the proposed definition of field experiences. "Field experiences" means program components that are conducted in off-campus settings. They include classroom observations, tutoring, assisting teachers and school administrators, student teaching, and internships.</p> <p>"Field experiences" means program components that are conducted in off-campus settings or on-campus settings dedicated to the instruction of children who would or could otherwise be served by school divisions in Virginia and are accredited for this purpose by external entities such as regional accrediting agencies. They include classroom observations, tutoring, assisting teachers and school administrators, student teaching, and internships.</p> <p>Old Dominion University requests this change because we believe that the preparation of the graduates of our preK-3 and preK-6 programs who have practicums in our Child Development and Child Study Centers are better teachers because of these field experiences and are better able to meet the instructional and other learning needs of their preK-3 and preK-6 pupils in Virginia's schools. Also, we believe we are asking for a higher standard for on-campus settings that will not weaken the existing definition or intent of the Virginia Board of Education.</p> |

| Date | Name | Title & Organization | Comments on Accountability Measure 3: Field Experiences |
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| Date | Name | Title & Organization | Comments on Accountability Measure 4: Participation in Hard-to-Staff Schools |
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| 12/14/06 | Dr. Phil Wishon | Dean, College of Education, James Madison University | Requiring that candidates participate (directly) in hard-to-staff schools throughout the program is unrealistic and places undue time and financial burdens on IHEs in whose service area, very few (if any) hard-to-staff schools exist. This requirement therefore accords an unfair advantage to IHEs in whose service area have a relatively high number of hard-to-staff schools exist. It is suggested that the wording of the proposed regulation be changed so as to require that candidates "interact with" hard-to-staff schools throughout the program. |
| 9/30/05 | Dr. Lissa Power-de Fur | Chair, Department of Education, Longwood University | Add definitions for hard-to-staff... |
| 12/15/06 | Dorothy J. Sluss, Ph.D. | Associate Dean, Teacher Education and Professional Services, The College of William and Mary | <p>I want to comment on 8 VAC-542-40- 4. <i>Evidence of opportunities for candidates to participate in hard-to-staff schools throughout the program experiences.</i> The indicator of achievement of this standard shall include evidence that the professional education program provide opportunities for candidates to have program experiences in hard-to-staff schools within each biennial period.</p> <p>We value the in-depth experiences that our students have in diverse clinical settings. Our students are placed in a variety of schools located throughout the peninsula area. They experience both urban and rural settings that provide rich experiences with diverse populations that include racial, economic, linguistic, and ethnic diversity. As we work with students, we place some of our students in schools situated close to campus due to their lack of transportation. The closest hard-to-staff elementary schools are located in Petersburg and Prince William County. These are both over an hour away from campus. Given that students are required to complete an arts and science major for certification in Virginia, they must take other classes in addition to their education classes so they can fulfill degree requirements. A trip to the closest school would require student to spend almost three hours on the road, not including any time spent in the school. Requiring all students to spend time in hard-to-staff schools will create a situation that is physically and fiscally impossible for some students. <u>This has the potential to</u></p> |

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| | | | <p><u>reduce the number of students who choose to pursue teaching as a career.</u> In addition, moving our entire student teaching population in and out of hard-to-staff schools may create a swinging door effect for the schools. Schools considered hard-to- staff would receive a barrage of requests from colleges and be forced to limit opportunities or face an endless stream of students who want to observe or assist students in the classrooms. This does not seem to be productive for the schools or for potential teachers. We request that you reconsider the terminology and replace hard-to-staff schools with “schools with diverse populations”.</p> |
| 12/15/06 | Dr. Sandi Cohen | Director of Teacher Education, Curry School of Education, University of Virginia | <p>While understanding the need to promote preparation of teachers for hard-to-staff schools, we are concerned that the approval process lists as a requirement the opportunity for experience in such schools. The Charlottesville area has a limited number of such schools and it is impossible for us to ensure that all students will have the opportunity to complete a field experience in such a setting. In addition, the state's own listing changes annually on these designations. A broader definition of at-risk schools would be helpful.</p> |
| 12/13/06 | Dr. Sharon deFur | Associate Professor, College of William and Mary | <p>I appreciate the importance of students having experience with the diversity of students that they will teach and I know how critical the field experiences are to the preparation of new teachers and how essential it is that they are mentored by outstanding teachers and administrators. I also believe that "hard-to-staff" schools often do not have those role models for beginning teachers that would prepare them to work in those environments. I am not certain of the policy intent behind this requirement, but believe it may be based on faulty assumptions that practica and student teaching in hard-to-staff schools lead teachers to choose to work in those schools. Our special education teacher candidates engage in two full-time student teaching experiences and we are careful to make sure that at least one of those experiences is in an urban environment and we make sure that the teachers and schools in that environment provide the support needed for that teacher to learn the skills to work with a diverse population of students. I urge the department and the BOE to think carefully about the policy intent and to either reword or re-define this performance measure.</p> |
| 12/14/06 | Lori Korinek | School of Education, College of William and Mary | <p>I agree that pre-service teachers should have experiences that prepare them to be effective with diverse students, but the requirement of “...evidence of opportunities to participate in <u>hard-to-staff schools</u>” may discourage rather than encourage students to work</p> |

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| | | | <p>in these schools.</p> <p>Our undergraduate students at the College of William and Mary are majoring in a subject matter discipline and can only “minor” or take a second major in education. They must take other campus courses along with their education experiences in order to complete their program of studies in a timely manner. There are not many hard-to-staff schools located in close proximity to our campus, so this requirement would cause them undue hardship in terms of having to extend their programs for additional semesters to meet the field requirements and in terms of expense to commute to field placements. I fear these obstacles would discourage students from majoring in education, and we would lose some of the best potential teachers because of these obstacles exactly the opposite of what we want.</p> <p>Given the turn-over in hard-to-staff schools, it is also difficult to find enough cooperating teachers in these schools who would provide student teachers with the guidance and models of best practices that are needed to become effective educators. In many instances in special education, many of the teachers in hard-to-staff schools may not have completed as intensive training as needed to be exemplary cooperating teachers, and systems of effective practice are often less evident in these schools. Since most of the hard-to-staff schools are not very close to our university, the distance would also limit the support that college supervisors could lend in developing strong student teachers. It would seem more effective to allow universities to find the strongest schools and cooperating teachers within a reasonable distance of campus who can model effective practices for diverse learners and support student teachers in developing those same skills.</p> |
| 12/15/06 | Dr. Virginia L. McLaughlin | Dean and Chancellor Professor, College of William and Mary | <p>In preparing this response to the <i>Proposed Regulations Governing Review and Approval of Education Programs in Virginia</i>, I have appreciated the changes that have been already made in the effort to address concerns of the teacher education community. The current document reflects much of our input over the past several years. In particular, I am pleased with the range of options for arts and science majors available for candidates in elementary education programs and the elimination of the requirement for “evidence of increased candidate enrollment.”</p> <p>Our three major areas of concern are as follows:</p> <p>(1) To ensure quality educators for the</p> |

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| | | | <p>Commonwealth, the proposed standards and regulations for program approval should apply to ALL programs in Virginia (e.g., four-year, five-year, fifth-year degree programs; alternate routes; career switchers; etc.). Furthermore, out-of-state institutions operating in the Commonwealth (e.g., GWU, Walden, Cambridge, etc.) must be required to go through the approval process.</p> <p>(2) The requirement for candidate experiences in hard-to-staff schools should be removed. Although the intent is very positive, it cannot be implemented effectively. The list of hard-to-staff schools changes annually and these schools are not accessible to all institutions. By definition, hard-to-staff schools have more novice and non-licensed personnel. The few experienced teachers are needed to mentor novice employees and provide instructional leadership; very few are available to serve as clinical faculty for preservice candidates. Require programs to provide clinical experiences with diverse students including children of poverty, but do not hold fast to the hard-to-staff list.</p> <p>(3) The provision for alternate routes to administrative endorsement will make Virginia standards among the weakest in the nation. Given the principal’s critical role as instructional leader, simply passing a test is insufficient evidence of minimal competence for the position. The children and schools most in need of strong, well-prepared school leaders will be most likely to be shortchanged by this provision. Require school leaders to complete meaningful preparation programs.</p> <p>Thank you again for the opportunity to provide input. We look forward to reviewing the revised documents.</p> |

| Date | Name | Title & Organization | Comments on Accountability Measure 5: Evidence of Contribution to PreK12 Student Achievement |
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| 12/15/07 | Leigh Butler, Ph. D. | Director of Teacher Education, Old Dominion University | <p>I would like to comment on evidence of contributions to prek-12 student achievement by candidates completing and exiting the program.</p> <p>This item states that candidates who complete or exit the program, regardless if they have passed or failed the required assessments or student teaching, will need to show an impact on student achievement. Again, higher education faculty provide all potential teachers accepted into approved programs the same opportunities to achieve. Yet, when teacher candidates exit the approved programs without completing the higher education institutions' professional requirements, the institution cannot and should not be required to show evidence of the exiter's impact on student learning. This is the equivalent of holding a teacher accountable for a student's test scores who never attends class.</p> |
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| Date | Name | Title & Organization | Comments on Accountability Measure 6: Employer Job Satisfaction |
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| 12/13/06 | Dr. Sharon deFur | Associate Professor, College of William and Mary | I appreciate the importance of follow-up on graduates and welcome the feedback from employers of our candidates. I urge the VDOE and the BOE to consider personnel evaluation confidentiality that might create an issue in collecting graduate specific data and to consider the resource demands on IHE of collecting data at this level of specificity. |
| 12/14/06 | Lori Korinek | School of Education College of William and Mary | I agree that <u>employer satisfaction/follow-up on graduates of teacher education programs</u> is important, but IHEs do not currently have the resources or personnel to conduct this follow-up at the level of detail suggested. Systems must be developed statewide to help in these efforts before this becomes a mandate. Confidentiality of information related to individuals must also be assured. |

| Date | Name | Title & Organization | Comments on Accountability Measure 7: Partnerships and Collaborations |
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| 11/1/05 | Dr. Ed Polloway | Teacher Educator, Office of Graduate and Community Advancement, Lynchburg College | <p>With the new guidelines in place for “highly qualified” special educators, I ask you to consider ways in which your partnerships with institutions of higher education can respond to these needs and challenges. For example, I would suggest the following:</p> <ul style="list-style-type: none"> • Consider ways to empower institutions to determine whether their own students are highly qualified (e.g., reviewing transcripts of current students, such as at the undergraduate level, to determine the coursework that they have completed as they represent distributions within specific content areas). • Consistent with the above point, consider whether there is justification for modifying guidelines so that those individuals at the pre-service (graduate or undergraduate) level who meet the distribution requirements (e.g., a minimum of 9 hours across the four disciplines in elementary education), will be able to be considered highly qualified upon graduation. While I understand why this may have been put in place to assist veteran teachers, empowering undergraduate programs to revise their curriculum to incorporate more content (with the “carrot” that these individuals subsequently will be highly qualified) will enable them to graduate individuals who will seek positions without deficiencies. In the long run, I believe that these individuals with stronger content backgrounds will be better prepared for teaching than others who had to subsequently take and pass the |

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| | | | <p>Praxis II examination as an option.</p> <ul style="list-style-type: none"> • Under the current guidelines, it appears that the “best way” for school divisions to deal with new teachers who are not highly qualified is to ensure that they are placed in collaborative roles. On the other hand, the ability to be most successful in a collaborative role speaks to relate to the kinds of more intensive study that may be expected at the graduate level. Thus, I can see significant merit in working with institutions of higher education to design such innovative programs for undergraduate students and, for those who have already participated in such programs, to modify graduate programs to build on these skills and develop advanced techniques in the areas of curriculum, instruction, and collaborative strategies. • We will continue to focus on ways that we can facilitate students’ efforts to respond to the challenge of being highly qualified with a K-12 license. Recommendation for any possible solutions will be welcomed. |
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